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FINAL ENVIRONMENTAL IMPACT REPORT

VALENCIA GARDENS HOPE VI PROJECT

City and County of San Francisco Planning Department

Planning Department Case No. 2002.0809E

State Clearinghouse No. 2002112048

Draft EIR Publication Date: March 22, 2003

Draft EIR Public Hearing Date: April 24, 2003

Draft EIR Public Comment Period: March 22, 2003 to April 29, 2003

Final EIR Certification: June 26, 2003

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● *Indicates material that is new or has been revised since publication of the Draft EIR*

Valencia Gardens HOPE VI Public Housing Project
Final Environmental Impact Report
June 26, 2003

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• CERTIFICATION MOTION

File No.: 2002.0809E
Valencia Gardens HOPE VI Project
Assessor Block 3546, Lot 2

SAN FRANCISCO

CITY PLANNING COMMISSION

MOTION NO. 16604

ADOPTING FINDINGS RELATED TO CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE REPLACEMENT CONSTRUCTION OF VALENCIA GARDENS HOPE VI PUBLIC HOUSING IN THE MISSION DISTRICT OF SAN FRANCISCO.

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 2002.0809E, Valencia Gardens HOPE VI Project, (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et. seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on November 9, 2002.

b. On March 22, 2003, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by the Project Sponsor on March 21, 2003.

d. On March 22, 2003, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse for the DEIR on March 24, 2003.

2) The Commission held a duly noticed public hearing on said Draft Environmental Impact Report on April 24, 2003 at which time opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on April 29, 2003.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 38-day public review period for the DEIR and prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period. This material was presented in a "Draft Summary of Comments and Responses," published on June 14, 2003, which was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4) A Final Environmental Impact Report has been prepared by the Department, consisting of the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.

5) Project Environmental Impact Report files have been made available for review by the Commission and the public. These files are available for public review at the Department offices at 1660 Mission Street, and are part of the record before the Commission.

6) On June 26, 2003 the Commission reviewed and considered the Final Environmental Impact Report including the Draft Summary of Comments and Responses, and hereby does find that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code.

7) The City Planning Commission hereby does find that the Final Environmental Impact Report concerning File No. 2002.0809E: Valencia Gardens HOPE VI Project reflects the independent judgment of the City and County of San Francisco, is adequate, accurate and objective, and that the Summary of Comments and Responses contains no significant revisions to

the Draft Environmental Impact Report, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

8) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the project as described in the Environmental Impact Report and as preferred by the project sponsor would have the following unavoidable significant environmental impacts which could not be mitigated to a level of nonsignificance:

a. For the purposes of CEQA, Valencia Gardens is treated in the EIR as an "historical resource." The demolition of Valencia Gardens would then be "deemed significant" per CEQA Section 21084.1. The proposed project would demolish all 22 existing residential buildings and would remove landscaping, sculptures and surface parking on the project site. Demolition would be a significant adverse effect of the proposed project on cultural resources. This potentially significant impact will be reduced, though not eliminated, by the implementation of the mitigation measures identified in the Final EIR.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of June 26, 2003.

Linda Avery
Commission Secretary

AYES:	Antonini, Boyd, Hughes, S. Lee
NOES:	0
ABSENT:	Bradford Bell, Feldstein, W. Lee
ADOPTED:	June 26, 2003

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I. SUMMARY

A. PROJECT DESCRIPTION (p. III-1)

The proposed project would be the replacement construction of Valencia Gardens Public Housing. Mission Housing Development Corporation (MHDC), in partnership with the San Francisco Housing Authority (SFHA), proposes to redevelop Valencia Gardens with a new residential development with supporting uses. The US Department of Housing and Urban Development (HUD) HOPE VI program, along with tax credit financing and other sources will be used to fund the project. The new construction would consist of 15 three-story buildings and two four-story buildings containing up to 290 residential units, a community center (approximately 5,400 square feet (sq.ft.)); a childcare center (approximately 3,500 sq.ft.); a computer learning center (approximately 3,000 sq.ft.); an outdoor child play space (approximately 2,300 sq.ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project would be designed with an architectural character intended to reflect the scale and style of residential structures in the surrounding neighborhood; the residential units would be oriented as walk-up apartments in street-facing row houses; the two buildings on Valencia Street would each have a residential entry elevator lobby. The Valencia Street buildings would have a ground story design that would reflect the commercial uses on that street. The project would include architectural features such as bay windows, varied rooflines and varied massing. New streets would be introduced to create blocks similar to those in the surrounding Mission District neighborhood.

The proposed project would demolish the existing Valencia Gardens. The existing 22 three-story buildings owned by the SFHA contain 246 rental units, community space, a computer learning center, property management facilities, a childcare center, community open space, and 82 surface parking spaces. In anticipation of the proposed project, and in compliance with the Valencia Gardens Relocation Plan submitted to and approved by HUD in 2000, approximately 172 of the 246 units (70 percent of the units) have been vacated. The remaining units would be relocated prior to demolition of the existing Valencia Gardens.

The Valencia Gardens project site is located at 340-370 Valencia Street on the block bounded by Valencia, Guerrero, 14th, and 15th Streets in the Mission District of San Francisco. The approximately five-acre site occupies most of the block on Lot 2 Assessor's Block 3546. The project site is within a RM-1 Zoning District (Residential, Mixed Districts, Low Density). The northernmost portion of the site is in a 50-X Height and Bulk District, and the remainder of the site is within a 40-X Height and Bulk District. The proposed project would require Conditional Use authorization from the Planning Commission to determine qualification as a Planned Unit Development (PUD) under Section 304 of the City Planning Code.

The MHDC's main objective is to build high quality, well designed, cost efficient and affordable multi-family and senior units, and community space to benefit to the residents and surrounding community. According to the MHDC, objectives of the Valencia Gardens HOPE VI project include:

- Continue to provide affordable housing opportunities yet decrease the concentration of public housing units;
- Provide unit types to best meet the needs of families and seniors in affordable housing;
- Provide economically sustainable supportive services for its residents as well as the community;
- Remediate the physical hazards of the existing Valencia Gardens, including soil stabilization;
- Blend the design of new buildings into the surrounding community; and
- Improve public housing facilities, amenities, security, and Americans with Disabilities Act (ADA) access at the site.

B. MAIN ENVIRONMENTAL EFFECTS (p. IV-1)

An application for environmental evaluation for the project was filed with the San Francisco Planning Department on July 17, 2002. On the basis of an Initial Study published on November 9, 2002, the San Francisco Planning Department determined that an EIR was required. The Initial Study determined that the following effects of the project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included as a part of the project, and thus required no further analysis: compatibility with

existing zoning and plans, land use, visual quality, population, transportation, noise, air quality, shadow, wind, utilities/public services, biology, geology/topography, water, energy/natural resources, hazards, and archeological resources. (The Initial Study has been included as Appendix A of this document). Therefore, the EIR does not discuss these issues. The Initial Study found the potential for significant environmental effects in the area of architectural resources.

ARCHITECTURAL RESOURCES

Valencia Gardens, sponsored by the San Francisco Housing Authority (SFHA), was designed by well-known architects Harry Thomsen and William Wurster in 1941, and was completed by late spring of 1943 under the US Housing Authority's slum clearance program. The complex is comprised of 22 linked three-story buildings arrayed in a serpentine plan with internal courtyards. Valencia Gardens is an example of a "court plan," using inward facing buildings at the perimeter of the site, creating spacious and protected inner courtyards. Architect William Wurster has been widely recognized for his use of Bay Area architectural style and has been called the founder of the Bay Area regional school of architecture. The Valencia Gardens buildings have been altered over the last 59 years but are currently considered to be in a fair condition.

Garden courtyards, including rounded beds on the site, were designed by well-known landscape architect Thomas Church. Thomas Church was responsible for the design of over 2,000 residential gardens, housing developments, and corporate and college campuses, and is considered a pioneer of modern landscape design. The garden courtyards retain a high degree of integrity.

Sculptures created by Beniemino (Benny) Bufano were featured in the courtyards and are still at their original location. These sculptures are in good condition and would be removed during construction; subject to approval of the San Francisco Arts Commission, the owners of these sculptures, the sculptures would later be incorporated into the proposed project.

The SFHA was awarded a HUD HOPE VI grant in 1997 for improvements to Valencia Gardens. In order to release the HUD HOPE VI grant funds for demolition or re-construction

of Valencia Gardens, the proposed project requires review pursuant to Section 106 of the National Historic Preservation Act. It is anticipated that SFHA and State Historic Preservation Office (SHPO) will enter into a Memorandum of Agreement to address the project's effects on historical properties including demolition of the existing structures and archaeological resources pursuant to Section 106.

The survey prepared by Carey & Co. for the Section 106 review concludes that the Valencia Gardens complex is eligible for listing as a district on the National Register of Historic Places under Criterion A, due to its association with the social and architectural history of public housing, and under Criterion C, because it is the work of a well-known Bay Area architect, landscape architect and sculptor, and embodies the distinctive characteristics of the Modern style associated with the Bay Area. The Valencia Gardens complex appears to fall under the category of district in that it possesses a significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically by plan or physical development.

If the Section 106 process results in determination that Valencia Gardens meets National Register criteria, Valencia Gardens would then be included in the California Register of Historical Resources and would meet the definition of an "historical resource." The demolition of Valencia Gardens would then be "deemed significant" per CEQA Section 21084.1. The proposed project would demolish all 22 existing residential buildings and landscaping and would remove surface parking on the project site. Demolition of the existing Valencia Gardens buildings would be a significant adverse effect of the proposed project on cultural resources.

C. MITIGATION AND IMPROVEMENT MEASURES (p. V-1)

Mitigation measures identified in this EIR or in the Initial Study to mitigate significant environmental effects are listed below. Certain Mitigation Measures that were included in the Initial Study have been revised since the publication of the Initial Study; changes to the measures are indicated in underline. Mitigation measures would reduce but not eliminate significant architectural resources effects.

ARCHITECTURAL RESOURCES

1. Prior to any physical removal of buildings or site features, the Project Sponsor would prepare, or cause to be prepared, documentation of the Valencia Gardens complex. Such documentation would include the precise recording of the structures through measurements, drawings, and photographs and would meet the Historic American Buildings Survey (HABS) recordation standards. The HABS documentation would include the following:

   - HABS outline report would be prepared and would include descriptive and historical information on the buildings, the architects, the landscaping, the landscape architect, the sculptures, and the artist. Information from the previous reports prepared, including the *Valencia Gardens Draft Historic Significance Evaluation*, Carey & Co., 1997, and the *Verification of Historic Significance, Valencia Gardens HOPE VI Project,* Carey & Co., 2002, would be used to fulfill some of the requirements for descriptive and historical information

   - Photographic documentation of the exterior of Valencia Gardens' neighborhood setting, buildings, courtyards, landscape and site features, and sculptures would be prepared.

   - Photographic documentation of selected interiors, including a typical dwelling unit, would be prepared. The selected dwelling unit would be appropriately described in the outline report and keyed to the photographs.

   - All photographic documentation would follow the HABS Photographic Standards for detail and quality, use of large format photographs and negatives, archival processing, labeling, and sacrificial test prints. Two sets of archival prints and one set of archival negatives would be prepared.

   - Existing architect's drawings of the housing complex would be included in the HABS documentation. Reference would be made in the documentation report to the repository where the drawings are housed.

2. The documentation of Valencia Gardens would be submitted to the following repositories:

   Documentation report, one set of photographs and negatives, and a copy of the original drawings (identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster") would be submitted to the History Room of the San Francisco Public Library.

   - Documentation report would be submitted to the Northwest Information Center of the California Historical Resources Information Resource System.

   - Documentation report, one set of photographs, original drawings, and rehabilitation drawings would be submitted to the Wurster, Bernardi & Emmons Collection, 1922-1974, Environmental Design Archives in the College of Environmental

Design, University of California, Berkeley. The original drawings are identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster." The rehabilitation drawings are identified as "Renovation Drawings for Kitchens and Bathrooms on 12-28-73 by the Housing Authority of the City and County of San Francisco." Both drawings sets are in the possession of the San Francisco Housing Authority and would be examined by a conservator prior to their donation.

- The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Planning Department for review prior to issuance of any permit that may be required by the City and County of San Francisco for demolition of Valencia Gardens.
- The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Landmarks Preservation Advisory Board.

3. The Project Sponsor would provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Valencia Gardens Housing Project. The interpretive display would also include information on why the existing Valencia Gardens housing is inappropriate for its current use as discussed in the HOPE VI application section on existing conditions, as well as published articles regarding the design goals of the HOPE VI program, and the design goals developed in the resident design workshops for Valencia Gardens, which together show how social thinking has changed regarding what is now considered appropriate public housing design. The interpretive display would be submitted to the San Francisco Landmarks Preservation Advisory Board for review and approval prior to issuance of a final certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The LPAB may appoint a liaison to work with the Project Sponsor in directing the research on the interpretive materials.

4. The Project Sponsor, along with the President of the LPAB, would work with the San Francisco Arts Commission to incorporate the Bufano sculptures into the proposed site design. Subject to Arts Commission approval, the Bufano sculptures would be returned to the project site after construction. Prior to removing the sculptures from the site, an art conservator would inspect each sculpture to determine their existing condition. A qualified mover with experience in moving fine art pieces would be contracted to move the sculptures to a storage facility during construction of the proposed project. The storage facility would be one recommended by the art conservator. The same moving company would move the sculptures back, and the art conservator would supervise their placement on the project site.

NOISE

5. The Project Sponsor shall require project construction contractor(s) to pre-drill holes to the maximum depth feasible on the basis of soil conditions. Contractors shall be required to use construction equipment with state-of-the-art noise shielding and muffling devices.

6. The Project Sponsor shall incorporate any noise mitigation measures identified in the Noise Assessment of the Special Environmental Clearance prepared according to HUD regulations (24 CFR Part 51, Subpart B).

AIR QUALITY

7. The Project Sponsor shall require the contractor(s) to spray the site with water during excavation and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during excavation and construction at least once per day to reduce particulate emissions.

8. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the Project Sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The Project Sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions from equipment that would be in frequent use for much of the construction period.

GEOLOGY

9. One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The Project Sponsor and its contractors shall follow the recommendations of the final geotechnical reports regarding any excavation and construction for the project. The Project Sponsor shall ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent buildings for damage during construction, if recommended by the geotechnical engineer.

10. If dewatering were necessary, the final soils report shall address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the soils report would determine whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the Project Sponsor to perform this monitoring.

Instruments shall be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge shall be used to halt this settlement. The Project Sponsor shall delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street shall be born by the Project Sponsor.

If dewatering were necessary, the Project Sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

11. The Project Sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems shall be modified as necessary in the event that substantial movements are detected.

WATER QUALITY

12. If dewatering were necessary, the Project Sponsor shall follow the recommendations of the geotechnical engineer or environmental remediation consultant, in consultation with the Bureau of Environmental Regulation and Management of the Department of Public Works, regarding treatment, if any, of pumped groundwater prior to discharge to the combined sewer system.

    If dewatering were necessary, groundwater pumped from the site shall be retained in a holding tank to allow suspended particles to settle, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works to reduce the amount of sediment entering the combined sewer system.

13. The Project Sponsor shall require the general contractor to install and maintain sediment traps in local storm water intakes during construction to reduce the amount of sediment entering the combined sewer system, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works.

HAZARDS

14. In addition to local, state, and federal requirements for handling hazardous materials and soil and groundwater containing chemical contaminants, the Project Sponsor shall enter into a remedial action agreement with the Department of Public Health pursuant to Health and Safety Code Section 101480 et seq. At a minimum, the Project Sponsor shall undertake the following work and any additional requirements imposed by the Department of Public Health under the agreement if soil samples for waste characterization and disposal acceptance indicate that chemical concentrations in the soil are above any of the U.S. EPA Preliminary Remediation Goals for Residential Soil (PRGs).

a. The Project Sponsor shall implement a project specific health and safety plan (HSP) to be used during construction activities. The HSP shall address the safety and health hazards of the project and procedures for the protection of construction workers whom may be in contact with potentially contaminated soil. The HSP shall also specify site control programs, engineering controls, safe work practices, air monitoring requirements, and a description of proper personal protective equipment. The plan shall also include measure to minimize public exposure to potentially contaminated soil (i.e., dust). Such measures would include dust control, appropriate site security, restriction of public access, and posting of warning signs.

If contaminated soils are encountered during earth-moving activities, these soils shall be disposed of off-site in accordance with California hazardous waste disposal regulations (CCR Title 26) or shall be managed in place with approval of the California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), or the San Francisco Department of Public Health (DPH).

b. Prior to any demolition or excavation at the project site the Project Sponsor shall conduct surveys to identify any potentially hazardous materials (e.g., asbestos, lead-based paints, PCBs, mercury) in existing buildings or building materials. At a minimum, these surveys shall identify any hazardous materials that would require removal and disposal prior to demolition. These surveys shall be completed by a Registered Environmental Assessor or a similarly qualified individual.

c. All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and any other agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the Project Sponsor shall submit to the San Francisco Planning Department and the San Francisco Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report shall be certified by a Registered Environmental Assessor or a similarly qualified individual who states that all necessary mitigation measures have been implemented.

ARCHAEOLOGICAL RESOURCES

15. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The Project Sponsor shall retain the services of a qualified archeological

consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (Archeo-Tec., *From Bull Fights to Baseball: Archaeological Research Design and Treatment Plan for the Valencia Gardens HOPE VI Project*, December 2002) at the direction of the Environmental Review Officer (ERO). In instances of any inconsistency between the requirements of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirement of the latter shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the Project Sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.
- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, Project Sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of,

with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the human remains are not Native American, the archaeological consultant will notify the Roman Catholic Archdiocese of San Francisco who will be afforded a reasonable time to make recommendations to the Project Sponsor and consultant for the treatment and disposition of the remains and associated burial items. Following consultation with the Roman Catholic Archdiocese, a procedure for the treatment of non-Native American human remains and associated burial items that may include the preservation, removal, analysis, curation, or reinternment of the human remains and/or associated burial items will be formulated and implemented.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

IMPROVEMENT MEASURES

Improvement Measures identified in this Draft EIR or in the Initial Study to reduce effects of the project that are identified in the environmental analysis as being less-than-significant impacts are listed below.

Improvement Measure 1. Loading

To accommodate large truck deliveries, particularly for move-ins, the building management shall work with tenants to schedule large deliveries and block off on-street parking spaces in the private street with cones for loading activities. To accommodate passenger loading for the childcare use, two on street parking spaces on Valencia shall be designated a passenger loading zone during the morning drop-off and afternoon pick

up periods. This shall be accomplished though Project Sponsor coordination with the DPT.

Improvement Measure 2. Limit Construction Movement of Off-Peak Hours

Any construction traffic occurring between 7:00 AM and 9:00 AM or between 3:30 PM and 6:00 PM would coincide with peak hour traffic and could impede traffic flow. The impact of lane closures and construction traffic would decrease the capacity of streets and slow the movement of traffic (including Muni buses). To the extent possible for future projects in the study area, truck movements shall be limited to the hours between 9:00 AM and 3:30 PM to minimize disruption of the general traffic flow on adjacent streets.

Improvement Measure 3. Coordinate with City Departments to Reduce Traffic and Pedestrian Impacts During Construction

The Project Sponsor and construction contractor shall meet with the Traffic Engineering Division of the Department of Parking and Traffic and the Fire Department to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of the project. In addition, to ensure that construction activities do not impact Muni bus stops or routes in the area, the Project Sponsor shall coordinate with Muni's Chief Inspector prior to construction.

D. UNRESOLVED ISSUES AND AREAS OF CONTROVERSY (p. VI-1)

The principal area of controversy associated with the proposed project is the potential impact of demolition of Valencia Gardens. For purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an historical resource and its demolition would be a significant adverse effect. However, if Section 106 results in a determination that the project was not eligible for listing in the National Register of Historic Places, than its status under CEQA could be revised.

The design of the proposed buildings is not final and the EIR analysis of potential impacts associated with the replacement buildings is based on schematic or preliminary design information that could be refined and/or modified during the project review and approval process. Design modifications are not expected to alter the analysis and conclusions of this EIR; however, any proposed changes will be evaluated by Planning Department staff to determine if new significant impacts would result.

E. ALTERNATIVES (p. VII-1)

In compliance with CEQA requirements, this EIR analyzes a reasonable range of project alternatives that would reduce or eliminate significant impacts of the project. These alternatives include: a No Project Alternative, and the Preservation/Rehabilitation Alternative. A No Project Alternative would cause the SFHA to forfeit use of its HOPE VI funding, awarded by the HUD for the purpose of revitalizing Valencia Gardens. The loss of federal funding would limit the SFHA's ability to provide affordable housing opportunities and decrease the concentration of public housing units. The Preservation/Rehabilitation Alternative would preserve the defining exterior characteristics of the existing Valencia Gardens buildings while substantially upgrading the interiors to meet current building code requirements.

CEQA requires the identification of a project alternative that would eliminate or reduce identified significant impacts unless the alternative is determined to be infeasible based on substantial evidence in the record. In the event that Valencia Gardens is determined to be an historical resource, the Preservation/Rehabilitation Alternative (Alternative B) would be the environmentally superior alternative.

ALTERNATIVE A: NO PROJECT

None of the potential impacts associated with the project would occur with the No Project Alternative. The existing 22 buildings would not be demolished, and existing population, transportation, cultural resources, and geologic conditions would not change. Under this alternative, the existing 22 buildings may further deteriorate, and the existing problems with security, privacy, building system obsolescence, earthquake safety, open space, poor unit design, and institutional building design not integrated with the neighborhood would be expected to remain. The No Project Alternative would preclude the development of 247 well-designed, safe, and livable affordable housing units, and would cause the SFHA to forfeit use of its HOPE VI funding. The No Project Alternative would not meet most of MHDC's or the SFHA's objectives.

ALTERNATIVE B: PRESERVATION/REHABILITATION OF EXISTING BUILDINGS

The Preservation/Rehabilitation Alternative would preserve the Valencia Gardens Public Housing buildings in accordance with *The Secretary of the Interior's Standards for Treatment of Historic Properties*, while substantially upgrading the interiors, of all 246 units, to conform to current code requirements. The Preservation/Rehabilitation Alternative would retain the buildings' inherent architectural design and physical arrangement, characterized as having problems with security, privacy, building system obsolescence, open space, poor unit design, and institutional building design not integrated with the neighborhood. The Preservation/Rehabilitation Alternative would not meet all or most of MHDC's or the SFHA's objectives.

The Preservation/Rehabilitation Alternative was previously explored by MHDC, SFHA and Valencia Garden residents in November 2000. In addition to evaluating how a preservation alternative and a new construction alternative would meet project goals, the cost of each alternative was estimated. While not an environmental issue, MHDC found that a preservation alternative would cost approximately 8 percent more than the proposed project, making it more cost effective to demolish and rebuild the residential development using HOPE VI funding.

II. PROJECT REVISIONS

A. PROPOSED REVISIONS

Mission Housing Development Corporation (MHDC), in partnership with the San Francisco Housing Authority (SFHA), proposes to redevelop the Valencia Gardens Public Housing with a new residential development with supporting uses within the block bounded by Valencia, Guerrero, 14th, and 15th Streets in San Francisco's Mission District. The US Department of Housing and Urban Development (HUD) HOPE VI program, along with tax credit financing and other sources, will be used to fund the project.

On November 9, 2002, the Planning Department published the Initial Study for the Valencia Gardens HOPE VI Public Housing Project. The Initial Study analyzed the project description as of October 2002. This project included the demolition of the existing 246-unit Valencia Gardens Public Housing complex and its replacement with 247 residential units; a community center (approximately 4,000 sq. ft.); a childcare center (approximately 3,200 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project included 17 three-story buildings designed to reflect the scale and style of surrounding residential structures.

As discussed in the Project Description of the Initial Study, the proposed project would require Conditional Use authorization from the Planning Commission to determine qualification as a Planned Unit Development (PUD) under Section 304 of the City Planning Code. A PUD allows for development of sites of considerable size (greater than one-half acre) as an integrated unit and permits well reasoned modifications of certain provisions of the Planning Code such as parking, open space, rear yard, and bulk standards. The PUD application was submitted on December 5, 2002, and, as part of the process, Planning Department staff urban design advisory team (UDAT) reviewed the schematic designs for the project.

In a memo dated January 16, 2003, the Planning Department formalized their direction for the Valencia Garden project (see Appendix B); the memo identified concerns related to the Valencia Street frontage:

- The ground floor, if not in actual commercial use, should be designed to appear as commercial street frontage, and
- The building on the corner of 15th and Valencia Streets should be more prominent and should rise to a higher height than the rest of the project.

In January 2003, in response to the Planning Department comments, MHDC revised the design of the project.

In the October 2002 project, exterior stairways to the second and third story residential uses along Valencia Street broke up the mass of the building and did not provide for the commercial appearing street frontage recommended by the Planning Department. The building on Valencia Street provided the childcare center and the computer center on the ground story, and residential units on the second and third stories. The building on the corner of 15th and Valencia Streets provided the community center on the ground story, and residential units on the second and third stories. The February 2003 project proposes the two buildings along Valencia Street each have a single residential entry to allow the ground story to reflect the continuous commercial character of the neighborhood along Valencia Street.

The October 2002 project design proposed three-story structures on the site. The February 2003 project increases the height of the buildings along Valencia Street, providing for a fourth story, to increase prominence along this street frontage to better relate to the height of the existing buildings. The February 2003 project proposes commercial uses on the ground story and residential uses on the three stories above.

Changes in design resulted in changes in the unit mix. In order to provide a single entry and greater than three stories, a different type of building would be needed from those proposed along Valencia Street in October 2002. The appropriate design solution to incorporate these building elements was determined to be a four-story building, served by an elevator, with single-level apartments accessed from a central corridor on each floor above the ground story. HOPE VI Design Guidelines and the management experience of the SFHA directed MHDC

and its design team to restrict the populations housed in such "double-loaded corridor" elevator building configurations to seniors. The February 2003 project provides a new mix of units, including senior units, which effectively addresses the needs of returning residents as well as the program needs of the SFHA, and incorporates Planning Department design recommendations.

Proposed changes are outlined in Tables 1 and 2. A full description of the project is included in Chapter III, Project Description.

TABLE 1
REVISED VALENCIA GARDENS PROJECT DESCRIPTION

Use	Existing Valencia Gardens[1]	October 2002 Proposed Project[2]	February 2003 Proposed Project[3]
Residential GSF	145,300	245,700	263,400
Residential Units	246	247	290
Childcare Center	2,000	3,200	3,500
Dedicated Childcare Openspace	4,900	2,200	2,300
Community Center	4,600	4,000	5,400
Computer Center	--	4,000	3,000
Parking Spaces	80	86	86
Loading Spaces	2	0	0
Building Height	30 to 35 feet	30 to 40 feet	32 to 48 feet
Number of Stories	3 Stories	3 Stories	3 and 4 Stories
Number of Buildings	22	17	17

1. Source: Environmental Evaluation Application, July 2002.
2. Source: Initial Study, November 9, 2002.
3. Source: Memorandum from Fred Pollack, Van Meter Williams Pollack, Architecture Urban Design, February 11, 2003.

The revised mix of units is presented in Table 2. The number of units and unit mix represents a reasonable maximum development scenario. MHDC anticipates developing approximately 275-280 units on the site. The 290-unit estimate allows flexibility in the unit mix to account for evolution in detailed building design.

TABLE 2
CHANGES IN RESIDENTIAL UNIT MIX

Residential Use	Existing Valencia Gardens	October 2002 Proposed Project	February 2003 Proposed Project
Senior unit	0	0	66
1 bedroom unit	114	20	15
2 bedroom unit	102	130	114
3 bedroom unit	30	85	83
4 bedroom unit	0	12	12
Residential Total	*246*	*247*	*290*

Source: Mission Housing Development Corporation

B. CONCLUSIONS IN THE INITIAL STUDY

As discussed above, the Initial Study published in November 2002 analyzed a different project than what is currently being proposed. However, these changes do not alter the conclusions reached for each issue topic discussed in the Initial Study. These conclusions are presented below for each topic.

COMPATIBILITY WITH EXISTING ZONING AND PLANS

The project site is located within a RM-1 (Residential, Mixed Districts, Low Density) zoning district. The proposed uses on the site have not changed, and all of the proposed uses are permitted under the current zoning. The northernmost portion of the site is a 40-X Height and Bulk District and the remainder of the site is a 50-X District. The February 2003 project's buildings, three stories (30 to 35 feet) on the northern portion of the site, and four stories (32 to 48 feet) on the southern portion of the site, would be consistent with the 40-X and 50-X Height and Bulk Districts. The proposed project would continue to require Conditional Use authorization from the Planning Commission to determine qualification as a Planned Unit Development (PUD) under Section 304 of the City Planning Code.

The revisions to the project would not change the proposed uses on the site. Therefore, the revised project would remain consistent with the existing zoning controls as well as the

proposed zoning for the Mission District and the Market and Octavia area. The project remains consistent with environmental plans and policies and the City's General Plan policies.

Land Use

The October 2002 project proposed to replace the existing 22 three-story buildings (approximately 175,300 gsf) containing 246 residential units and 82 surface parking spaces with 17 three-story buildings (approximately 259,100 gsf) 86 surface parking spaces. The February 2003 project would replace the existing buildings with 15 three-story buildings and 2 four-story buildings (approximately 277,600 gsf) and 86 surface parking spaces. The increase in height along Valencia Street, and increase of 18,500 gsf, which is primarily for the additional residential units, would not change the conclusions on land use reached in the Initial Study.

The proposed three-story and four-story buildings would generally be consistent with the density, height and scale of surrounding residential uses. The project's residential and other uses would be consistent with existing residential and retail land uses in the vicinity and would not have a substantial adverse effect on land use, nor would it disrupt or divide the physical arrangement of an established community.

Visual Quality

The October 2002 project description included 17 three-story buildings with a height ranging from 32 to 40 feet. The February 2003 project would include 15 three-story buildings with a height ranging from 32 to 40 feet, and two-four story buildings with a height ranging from 40 to 48 feet, an increase in eight feet along the Valencia Street frontage. Both the October 2002 and February 2003 projects would include demolition of 22 existing buildings, ranging from approximately 30 to 35 feet in height, and both projects would be somewhat taller than the existing three-story buildings on the site, and about the same height as the residential buildings, ranging from two to three stories or about 20 to 40 feet tall, near the site on 15th Street, Guerrero Street, and the buildings to the north of the site that front 14th Street. The February 2003 buildings would continue to incorporate materials, window patterns and styles, colors, textures, roof forms, and a vertical emphasis that are present in the neighboring

residential buildings with the intention of being compatible with the character of the surrounding neighborhood. In addition, the February 2003 project would be more consistent in design with the commercial uses along Valencia Street.

The increase in the number of residential units does not substantially change the density of development proposed for the project site. The revised development pattern would be similar to existing three- to four-story residential and commercial development on Valencia, 15th, Guerrero, and 14th Streets.

The revised project would add eight feet in height to the Valencia Street corridor and does not change the heights proposed on the balance of the site. The conclusions in the Initial Study, that the buildings would be visible from nearby locations on Valencia, 15th, Guerrero, and 14th Streets and would replace views of the existing Valencia Gardens buildings, and that views of the buildings would be limited from other nearby viewpoints as they would be blocked by other existing buildings remain. The project would not degrade scenic views of the San Francisco Bay or other public areas, and would not have a substantial, demonstrable negative aesthetic effect.

As with the October 2002 project, additional light would be introduced by the increased street density of the proposed project but would not significantly affect surrounding properties. The project would comply with City Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass.

Population

Population estimates for the uses on the site are outlined in Table 3. The increase in residential units with the February 2003 project, the change in the mix of units, and the one additional employee assumed to be needed for the senior units, would increase the population on the site to 1,244. This is 47 persons (3 percent) more than that with the October 2002 project. However, this increase would not change the conclusions reached in the Initial Study. The increase of population on the site would not be significant relative to the amount of residents and employees within the project vicinity; nor would it be significant with regard to

expected increases in the population and employment of San Francisco. No significant physical environmental effects on housing demand or population would occur.

TABLE 3
EXISTING AND PROPOSED SITE POPULATION

	Existing		October 2002 Proposed Project			February 2003 Proposed Project		
Residential Use	**No. Units[1]**	**Popula-tion**	**No. Units**	**Pop/ unit[3]**	**Popula-tion**	**No. Units**	**Pop/ unit[3]**	**Popula-tion**
Senior unit	0	NA	0	2	0	66	2	132
1 bedroom unit	114	NA	20	2	40	15	2	30
2 bedroom unit	102	NA	130	4	520	114	4	456
3 bedroom unit	30	NA	85	6	510	83	6	498
4 bedroom unit	0	NA	12	8	96	12	8	96
Residential Total	*246*	*599[2]*	*247*		*1,166*	*290*		*1,212*
Non-Residential Use	**Employees[1]**		**Employees[1]**			**Employees[1]**		
Management, Community Center, Computer Learning/ Training Center	10 (4,600 sq ft)		11 (8,000 sq ft)			12 (8,400 sq ft)		
Childcare Center	3 workers 22 children (11 non-residents)[4]		5 workers 30 children (15 non-residents)[4]			5 workers 30 children (15 non-residents)[4]		
Non-Residential Total	*24*		*31*			*32*		
TOTAL	**623**		**1,197**			**1,244**		

1. Source: Mission Housing Development Corporation
2. The residential total is from the 1997 SFHA Public Housing Operation Department rent roll, before the relocation of residents began. The rent roll provides the total number of occupied units (243) and the total population for the site (599). Door-to-door surveys of population per unit at Valencia Gardens have previously been conducted and have indicated a higher number of residents per unit and issues of overcrowding. Using the rent roll statistic for the analysis in this document is the conservative approach. The increase in population on the site is what is analyzed, and a lower existing population provides for a greater increase in population.
3. The SFHA has admissions and continued occupancy policies, based on HUD criteria, which outline a range of population per number of bedrooms and relate to the number of adults, number of children, and gender of children in a unit. For the purpose of this analysis the highest number in the range was used.
4. Approximately 50 percent of the children in the childcare center would be non-residents.

As with the October 2002 project, the February 2003 project would displace 246 units of existing public housing. The Valencia Gardens Relocation Plan was submitted to and approved by HUD in 2000. As of January 2003, approximately 172 of the 246 units (70 percent of the units) have been vacant; residents have been relocated to other housing in the San Francisco Bay Area.[1] All eligible Valencia Gardens residents would be offered an opportunity to return to Valencia Gardens after construction. The remaining residents would be relocated prior to demolition of the existing Valencia Gardens.

Transportation

A transportation memorandum, dated October 20, 2002, was prepared for the proposed Valencia Gardens HOPE VI project and is available for public review at the Planning Department.[2] A supplemental transportation memorandum was prepared on February 14, 2003, to address the changes proposed to the project and is also available for public review at the Planning Department.[3] The information presented below is based on the February 2003 memorandum.

Trip Generation. The revised program would result in a net increase over existing conditions of 439 daily person trips and 39 PM peak-hour person-trips. This would be an increase of 113 daily person-trips, and a decrease of 19 PM peak-hour person trips, compared to the October 2002 project. The decrease in PM peak hour person trips is the result of the lower PM peak-hour trip rate used for senior housing. The February 2003 project would generate approximately fourteen new PM peak hour vehicle trips, five fewer trips than with the October 2002 project.

Traffic Impacts. As stated in the Initial Study, the intersection of 15th Street/Valencia Street operates at LOS D and the intersection of 14th Street/Valencia Street operates at LOS C. The intersections of 15th Street/Guerrero Street and 14th Street/Guerrero Street operate at similar levels of service. As with the October 2002 project, the February 2003 project's 14 new PM

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1 Lisa Pagan, Mission Housing Development Corporation, e-mail correspondence, February 21, 2003.
2 CHS Consulting Group. *Valencia Gardens Project Transportation Analysis*. October 30, 2002.
3 CHS Consulting Group. Revisions to Valencia Gardens Development Program. February 14, 2003.

peak hour vehicle trips would be spread out over area roadways and would not result in significant traffic impacts at these intersections.

Transit Impacts. The February 2003 project would generate approximately 14 transit trips (inbound and outbound) during the PM peak hour, nine fewer than the October 2002 project. As with the October 2002 project, these transit trips would be spread out over the 7 Muni lines (excluding the 14L, which does not offer PM peak service) and SamTrans and BART in the project vicinity. The revised project would not create any significant impacts on the local and regional transit service.

Parking Demand. The October 2002 project and the February 2003 project would both include 86 on-site parking spaces, six more spaces than currently exist on the site. The February 2003 project would generate a parking demand of 219 spaces, 212 for residents and seven for the childcare facility. The revised project would generate a demand of five fewer parking spaces than the October 2002 project. The February 2003 project would result in a 133 space shortfall (219-86); however, when accounting for the existing shortfall of 95 spaces, the revised project would result in a net shortfall of approximately 38 spaces. As discussed in the October 30, 2002 memorandum, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA and are thus not considered as a significant project impact.

Planning Code Parking Requirements. As with the October 2002 project, the February 2003 project would be a Planned Unit Development (PUD), which requires parking for the residential use based on demand. The February 2003 project residential demand would be 212 spaces, and 86 spaces for the residential use are proposed. Childcare Code requirements require one parking space for every 25 children. Neither project proposes to provide parking for the childcare center, and thus would not meet Code requirements. As with the October 2002 project, the Project Sponsor would be required to obtain authorization for an exemption under the PUD per Section 304 of the Planning Code.

Loading Demand. The February 2003 project would increase the residential floor area from 245,000 gsf to 263,400 gsf, which would slightly increase the loading demand estimates. For

both the residential and childcare uses, there would be a peak-hour demand of less than one loading space. As with the October 2002 project, the February 2003 project would not provide any off-street loading spaces. While loading impacts are not considered to be significant, Improvement Measure 1 would be incorporated into the project to minimize non-significant impacts.

Planning Code Loading Requirements. Under the Planning Code, as with the October 2002 project, the February 2003 project would require two loading spaces. Neither project would provide any off-street loading spaces, and would meet this Code requirement. The Project Sponsor would be required to obtain authorization for an exemption under the PUD per Section 304 of the Planning Code.

Passenger Loading Impacts. The October 2002 and February 2003 projects would accommodate the same number of children in the childcare center, of which approximately 50 percent would be children from within Valencia Gardens. The discussion on passenger loading in the Initial Study remains applicable; specifically, the demand for passenger loading would be difficult to estimate. The main entrance to the childcare center would be on Valencia Street, and passenger drop-offs and pick-ups would generally occur on Valencia Street. Currently, there is metered parking on this frontage and these spaces are generally full. To accommodate passenger loading, the Project Sponsor would apply to the Department of Parking and Traffic (DPT) to designate up to two on-street spaces as a passenger loading zone during the morning and afternoon peak drop-off and pick-up periods.

Pedestrian Impacts. The February 2003 project would generate approximately 10 fewer PM peak-hour pedestrian trips (19 versus 29) than the October 2002 project. As with the October 2002 project, the pedestrian trips would be spread over area sidewalks and crosswalks, which currently operate with ample capacity. No significant pedestrian impacts are anticipated.

Bicycle Impacts. As with the October 2002 project, the February 2003 project would not likely generate a substantive number of bicycle trips. The project is not expected to result in a noticeable impact on bicycle conditions in the area.

Cumulative Impacts. The October 2002 program was estimated to generate approximately 19 PM peak-hour vehicle trips. This was determined not to be a considerable contribution to future cumulative traffic volumes at the intersections surrounding the project site. The reduction in PM peak-hour vehicle trips to 14 with the February 2003 project would further decrease the project's contribution to future cumulative impacts and would not contribute to significant cumulative traffic impacts.

Noise

Construction Noise. The additional building height along Valencia Street and the additional 43 units with the February 2003 project would not change overall construction activities or the construction schedule from that evaluated in the Initial Study. Therefore, the conclusions related to construction noise would not change. Demolition and other construction activities would be likely to cause temporary, substantial increases in noise, but would be expected to occur for a duration of less than 24 months for the entire project. All demolition and construction activities would be conducted in compliance with the San Francisco Noise Ordinance, and Mitigation Measure 1 would be included to reduce construction noise.

Traffic Noise. Generally, traffic must double on adjacent streets in order to produce a noticeable increase in noise levels. As with the October 2002 project, traffic volumes under the October 2003 project would not be expected to double as a result of the proposed project; therefore, substantial increases in traffic noise levels would not be anticipated in the project area.

Building Equipment Noise. As with the October 2002 project, the February 2003 project could include mechanical equipment, such as air conditioning units, which could produce operational noise. This equipment would be subject to and would have to comply with Section 2909 of the San Francisco Noise Ordinance, which limits noise from building operations; therefore, substantial increases in the ambient noise level due to building equipment noise would not be anticipated.

Interior Noise and Existing Noise Levels. As with the October 2002 project, residential and childcare uses within an interior courtyard would be included with the February 2003 project

development. The noise insulation requirements of Title 24 of the California Code of Regulations would continue to apply to residential occupancies and adherence to the standards of Title 24 would insulate the interior uses from excessive exterior noise levels. The childcare uses would continue to be insulated from exterior noise in accordance with Title 24. Likewise, the proposed development's interior courtyard would be enclosed by the project buildings on three sides and predominantly shielded from the exterior noise environment. Substantial increases in the interior noise level would not be anticipated.

Air Quality

Construction Emissions. As with the October 2002 project, construction emissions would be short term and temporary, but could still cause adverse effects on local air quality for the February 2003 project. Bay Area Air Quality Management District (BAAQMD), in its CEQA Guidelines, has developed an analytical approach that obviates the need to quantitatively estimate these emissions. Instead, BAAQMD has identified a set of feasible PM_{10} control measures for construction activities. The project includes Mitigation Measures 2a and 2b to reduce the effects of construction activities to an insignificant level.

Emissions from Traffic and Equipment Operations. As with the October 2002 project, potential air quality impacts from the February 2003 project could occur due to increased traffic throughout the region. The BAAQMD CEQA Guidelines indicate that residential projects of multiple-family housing would have potentially significant emissions if the proposed project includes more than 530 units of multi-family housing or generates more than 2,000 vehicle trips per day.[4] The February 2003 project would increase the daily vehicle trips by 144 to 909. Because the size of the February 2003 project remains below the screening thresholds in the guidelines, no potentially significant air quality impact is expected.

Shadow Effects. With the February 2003 project, the two buildings on Valencia Street would be greater than 40 feet in height (up to 48 feet), and subject to Section 295 of the City Planning Code. Section 295 of the Planning Code was adopted in response to Proposition K

[4] BAAQMD, *CEQA Guidelines*. Table 6, Projects with Potentially Significant Emissions, April 1996, p. 24.

(passed November 1984) in order to protect certain public open spaces from shadows cast by new structures during the period between one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the Planning Commission, in consultation with the Recreation and Park Commission, finds the impact to be insignificant. The proposed buildings along Valencia Street would reach a maximum height of up to 48 feet. To determine whether this project would conform with Section 295, a shadow fan analysis was prepared by the Planning Department. This analysis was completed on March 11, 2003, and determined that there is no shadow impact from the proposed project on any property protected by Section 295.[5] The Recreation and Park properties closest to the project site are Mission Dolores Park at 18th and Dolores Streets, and Mission Playground at 19th and Valencia Streets. Because both properties are several blocks south or southwest of the project site, there is no potential for shadow impacts from a 48-foot building at the site.

Wind Effects. To provide a comfortable wind environment for people in San Francisco, the City established specific comfort criteria to be used in the evaluation of proposed buildings in certain areas of the City. The project site is not located in one of these areas, nor would the project buildings extend above their surroundings so that substantial wind effects would occur. As with the October 2002 project, the February 2003 project would maintain the approximate overall location and massing of the existing structures on the site and would not substantially change wind conditions or create discomfort for pedestrians and people in nearby seating areas. No significant wind impacts would occur.

Utilities

The February 2003 project would propose 43 additional units and 47 additional people on the site; compared to the October 2002 project, this would be consistent with the previous conclusion that the project would not be expected to substantially increase the number of residents and employees on the site. This increase would not change the previous conclusions regarding effects on utilities or services. The project would not substantially change the

[5] A copy of the shadow fan analysis is available for public review by appointment at the Planning Department, 1660 Mission Street, San Francisco.

demand for schools, recreation or other public facilities. The project would not substantially increase existing solid waste, water or wastewater demand at the project site. The project site presently receives police and fire protection services, and the project would not create substantial additional demand for fire and police services in the area. The project site is already served by public utilities and communication facilities; no new energy or communications facilities would be necessary as a result of project implementation.

Biology

The proposed project site is in a heavily developed urban area and is covered by structures, impervious surfaces, and introduced landscaping. The increase in the number of units and building heights along Valencia Street would not change the conclusions regarding biological resources. Existing landscaping on the site, including mature trees at the interior of the site as well as other landscaping, would be removed and replaced with other landscaping appropriate for the urban landscape of the project site. The existing trees are not native to the site, nor are they rare or endangered, nor do they contain significant habitat value. Thus, removal of these trees would not be a significant impact. Redevelopment of the site would not be expected to affect, or substantially diminish, plant or animal habitats. Vegetation and wildlife effects of the project would not be significant.

Geology/Topology

The increase in the number of units and building heights along Valencia Street under the February 2003 project would not change the conclusions regarding geology and topology. The primary geotechnical issues that would continue to be addressed in the design are foundation type and supporting capacity, settlement under building loads and earthquake shaking, excavation and temporary shoring, and dewatering. Construction of the project would continue to require excavation to a depth ranging from about six to nine feet throughout the site. Stability and site safety during excavation would be achieved through standard, accepted shoring techniques. Because the building permit process provides for review of the site conditions and final building design, no people or structures would be exposed to potential geologic hazards, and the impact of the proposed project would be less than significant.

As with the October 2002 project, the February 2003 project would not significantly alter the topography of the site, or otherwise affect any unique geologic or physical features of the site.

Water

Both the October 2002 and the February 2003 projects would include excavation to remove partial basements beneath the existing Valencia Gardens buildings at about six to nine feet below grade. Conclusions regarding the likelihood that dewatering would be required would not change. Any groundwater encountered during construction would be subject to the requirements of the San Francisco Industrial Waste Ordinance (Ordinance No. 199-77), and the Bureau of Environmental Regulation and Management of the Department of Public Works would be notified if the project were to require dewatering. Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. The project would include Mitigation Measures 3b, 3c, 4a and 4b to reduce the potential water quality effects of dewatering.

The project site is almost entirely paved or covered by landscaping and structures. Both the October 2002 and the February 2003 project would cover approximately 75 percent of the area with paved surfaces. The project would not substantially affect the area of impervious surface at the site or alter site drainage.

Energy/Natural Resources

The increase in the number of units and building heights along Valencia Street under the February 2003 project would not change the conclusions regarding energy and natural resources. The Initial Study concluded that project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed projects would not result in a significant physical environmental effect.

Hazards

An Environmental Investigation (a Phase II Environmental Site Assessment (ESA)) of hazardous materials at the project site was prepared by Engineering/Remediation Resources Group in October 2001.[6] Findings of the ESA are available for public review by appointment at the San Francisco Planning Department. The ESA discusses existing conditions at the site and conclusion there in would not change with the proposed change in project.

Hazardous Material Use. The February 2003 project proposes the same uses as the October 2002 project, uses that would require relatively small quantities of hazardous materials for routine activities. Routine hazardous materials use in residential, community room, employment training center, and childcare uses are not typically considered to pose any substantial public health or safety hazards related to hazardous materials

Soil and Groundwater. Both the October 2002 and the February 2003 project would include excavation to remove existing partial basements beneath the existing Valencia Gardens buildings at about six to nine feet below grade. Conclusions regarding soils, and soil testing have not changed. Conclusions regarding the likelihood that dewatering would be required have not changed. Mitigation Measure 5 requires further characterization of soil and groundwater conditions. If additional environmental studies conclude that soil and groundwater conditions could pose significant human health or safety hazards, a Site Safety and Health Plan would need to be prepared pursuant to California Division of Occupational Safety and Health requirements and National Institute for Occupational Safety and Health guidance to ensure worker safety.

Building Materials. Both the October 2002 and the February 2003 projects require the demolition of the existing Valencia Gardens buildings. Both lead paint and asbestos have been

[6] Engineering/Remediation Resources Group, Inc., *Environmental Investigation, Valencia Gardens, San Francisco, California*, October 15, 2001.

identified at the Valencia Gardens site.[7] However, the proposed project includes Mitigation Measure 5, intended to reduce to the potential health risks associated with building materials containing asbestos, PCBs, lead, mercury, or other hazardous materials by securing the investigation, removal, and disposal of these materials prior to demolition of the buildings. Mitigation Measure 5 would ensure compliance with existing regulations applicable to the management of any potentially hazardous building components.

Fire Safety and Emergency Access. As with the October 2002 project, the February 2003 project would conform to fire safety the standards set in the provisions of the San Francisco Building Code and Fire Code. In this way, potential fire hazards (including those associated with hydrant water pressure and emergency access) would be addressed during the permit review process.

Cultural Resources

Archaeological/Cultural Resources. Both the October 2002 and February 2003 projects would include excavation of the project site to a depth of up to about 9 feet for the removal of existing partial basements, soil excavation, soil replacement, soil compaction and foundation construction. In December 2002, Archeo-Tec prepared *From Bullfights to Baseball: Archaeological Research Design and Treatment Plan for the Valencia Gardens HOPE VI Project*, which discusses research to date on the site and vicinity related to archaeological resources, and includes a research design and treatment plan for the excavation of the site. Although there is no indication of archeological resources at the project site based upon archival evidence, there is potential for the proposed project to disrupt or adversely affect previously unknown prehistoric resources and/or historical archaeological resources from the prehistoric period. The project includes Mitigation Measure 6 that would reduce the potential impact to archaeological/cultural resources to a less-than-significant level.

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[7] Health Science Associates, *Lead-Based Paint (LBP) Inspection and Testing Report on Valencia Gardens (CAL 1-4), Valencia Gardens Site: Valencia, Fifteenth & Guerrero*, December 6, 1994 and SCA Environmental, Inc., *Asbestos Survey Report for Valencia Garden Housing, San Francisco, CA, Volume 1 – Summary Report & Exterior (All Buildings)*, August 1994.

Architectural Resources. The evaluation of architectural resources relates to the demolition of the existing Valencia Gardens and not the redevelopment of the site. Both the October 2002 and the February 2003 projects would require the demolition of the existing Valencia Gardens buildings. A *Draft Historic Significance Evaluation, Valencia Gardens, San Francisco, California (July 1997)* prepared for the San Francisco Housing Authority identified that the Valencia Gardens Public Housing development appears eligible for the National Register of Historic Places under "Criterion A, due to its association with the social and architectural history of public housing, and under Criterion C, because it is the work of a well-known Bay Area architect, landscape architect and sculptor, and embodies the distinctive characteristics of the Modern style associated with the Bay Area." The Initial Study concluded that the because Valencia Gardens appears to be eligible for the National Register, Architectural Resources will be discussed in the EIR, including the potential significance of the Valencia Garden buildings, and the project's relationship to other historic resources in the vicinity. Architectural Resources are discussed in Chapter IV of this Draft EIR.

III. PROJECT DESCRIPTION

Mission Housing Development Corporation (MHDC), in partnership with the San Francisco Housing Authority (SFHA), proposes to redevelop the Valencia Gardens Public Housing with a new a residential development with supporting uses within the block bounded by Valencia, Guerrero, 14th, and 15th Streets in San Francisco's Mission District. The US Department of Housing and Urban Development (HUD) HOPE VI program, along with tax credit financing and other sources will be used to fund the project. The proposed project would demolish the existing 246-unit Valencia Gardens Public Housing complex and replace it with up to 290 new residential units, a community center, a childcare center, a computer learning center, outdoor child play space, other semi-public open space and parking. The proposed project would include 15 three-story buildings and two four-story buildings designed to reflect the scale and style of surrounding residential structures. The existing Valencia Gardens Public Housing, built in 1943, is owned by the SFHA, and consists of 22 linked three-story buildings designed by architects William Wurster and Harry Thomsen.

A. PROJECT OBJECTIVES

MHDC proposes to develop up to 290 units of mixed-income housing and community facilities at the site of the original Valencia Gardens Public Housing development. MHDC is charged with leveraging private and public financing for this development from the $20 million grant of HUD HOPE VI funds awarded to SFHA in 1996.

The MHDC's main objective is to build high quality, well designed, cost efficient and affordable multi-family and senior units and community space to benefit to the residents and surrounding community

According to the MHDC, objectives of the Valencia Gardens HOPE VI project include:

- Continue to provide affordable housing opportunities yet decrease the concentration of public housing units;
- Provide unit types to best meet the needs of families and seniors in affordable housing;

- Provide economically sustainable supportive services for its residents as well as the community;
- Remediate the physical hazards of the existing Valencia Gardens, including soil stabilization;
- Blend the design of the new buildings into the surrounding community; and
- Improve public housing facilities, amenities, security, and Americans with Disabilities Act (ADA) access at the site.

The Project Sponsor would not consider the proposed project a success if it would not meet the goal of helping to implement the City of San Francisco's housing policy. The proposed project would serve families with incomes ranging from extremely low- to low-income using HUD income definitions, thereby allowing working families the opportunity to remain in San Francisco. In addition, the proposed project would allow low-income families and seniors to live in high-quality, safe and affordable housing. The proposed project would increase the number of 2, 3 and 4 bedroom units, helping to meet the housing needs of larger families, and would also provide a large number of senior housing units. This is consistent with the City's Action Plan[1] to address the housing and community development needs of low income San Franciscans and addresses the goals established in the 2001-2005 Consolidated Plan[2], which includes the following priorities:

- Priority A, Increasing and preserving affordable housing by increasing and preserving affordable housing opportunities for a wide range of households, and maintaining and improving housing conditions; and
- Priority C, Preservation of existing and development of new affordable neighborhood facilities by providing funding for the preservation, and development of space for youth, senior, workforce development and other community development activities.

The project would also be consistent with the following housing objectives found in the Residential Element of the *San Francisco General Plan*[3]*:*

- Objective 1, Provide new housing for all income groups in appropriate locations;

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1 *Draft Action Plan for 2001-02*, Mayor's Office of Community Development, City and County of San Francisco, Program Year: 7/01/01-6/30/02.

2 *5 Year Plan for Fiscal Years 2001-2005*, San Francisco Housing Authority, City and County of San Francisco, October 1, 2001.

3 *San Francisco General Plan*, City and County of San Francisco, adopted June 27, 1996.

- Objective 4, Maintain and improve the physical condition of housing;
  - Policy 2, Maintain and improve the existing supply of public housing.
- Objective 5, Provide housing affordable for all income groups, particularly low and moderate income households;
  - Policy 1, Use the City's financial powers and resources to reduce the cost and increase the supply of low and moderate income housing.
  - Policy 2, Make maximum use of available federal and state housing subsidy programs.
- Objective 6, Provide a quality living environment.
  - Policy 1, Assure housing is provided with adequate public improvements, services and amenities.
  - Policy 4, Promote development of well designed housing.
- Objective 7, To provide maximum housing choice.
  - Policy 3, Promote the availability of units suitable for groups with special housing needs including large families, the elderly, and those needing group housing and emergency shelter.

The project would also be consistent with the following housing objectives found in the Urban Design Element of the *San Francisco General Plan*[4]:

- Objective 3, Moderation of major new development to complement the City pattern, the resources to be conserved, and the neighborhood environment.
  - Policy 1, Promote visual harmony in the visual relationship and transitions between new and older buildings.
  - Policy 5, Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.
  - Policy 6, Relate the bulk of buildings to the prevailing to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.
- Objective 4, Improvement of the Neighborhood Environment to increase personal safety, comfort, pride and opportunity.

[4] *San Francisco General Plan*, City and County of San Francisco, adopted June 27, 1996.

B. PROJECT LOCATION

The proposed Valencia Gardens project site is at 340-370 Valencia Street, on the block bounded by Guerrero, Valencia, 14th and 15th Streets, in the Mission District of San Francisco (see Figure 1). The approximately five-acre site occupies most of the block on Lot 2 Assessor's Block 3546. The project site is within a RM-1 (Residential, Mixed Districts, Low Density) Zoning district. The northernmost portion of the site is in a 50-X Height and Bulk District and the remainder of the site is in a 40-X Height and Bulk District.

The site is predominantly flat, with a slight descending (approximately 10 feet) of elevation to the east, and is bounded on the south by 15th Street, on the west by Guerrero Street and on the east by Valencia Street. There are three- and four-story residential buildings to the north of the project site that front on 14th Street. Guerrero Street in the project vicinity is predominantly two- to four-story residential buildings, with commercial uses on the street level of corner and mid-block buildings. Valencia Street in the project vicinity is predominantly three- to four-story residential buildings, typically with street-level commercial uses as well as some exclusively commercial buildings. Fifteenth Street in the project vicinity is predominantly two- to four-story residential buildings, with one- to two-story commercial uses. Overall, nearby land uses are predominantly single-family and multi-unit residential, with commercial uses at street level.

C. PROJECT CHARACTERISTICS

The proposed project would include 15 three-story buildings and two four-story buildings containing up to 290 residential units; a community center (approximately 5,400 sq. ft.); a childcare center (approximately 3,500 sq. ft.); a computer learning center (approximately 3,000 sq. ft.); an outdoor child play space (approximately 2,300 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project would demolish all 22 existing residential buildings and would remove surface parking on the project site. Eight of the sculptures designed by Beniemino (Benny) Bufano would be removed during construction; subject to the approval of the San Francisco Arts Commission, they would later be incorporated into the proposed project.

IS 2/19/03

SOURCE: EIP Associates

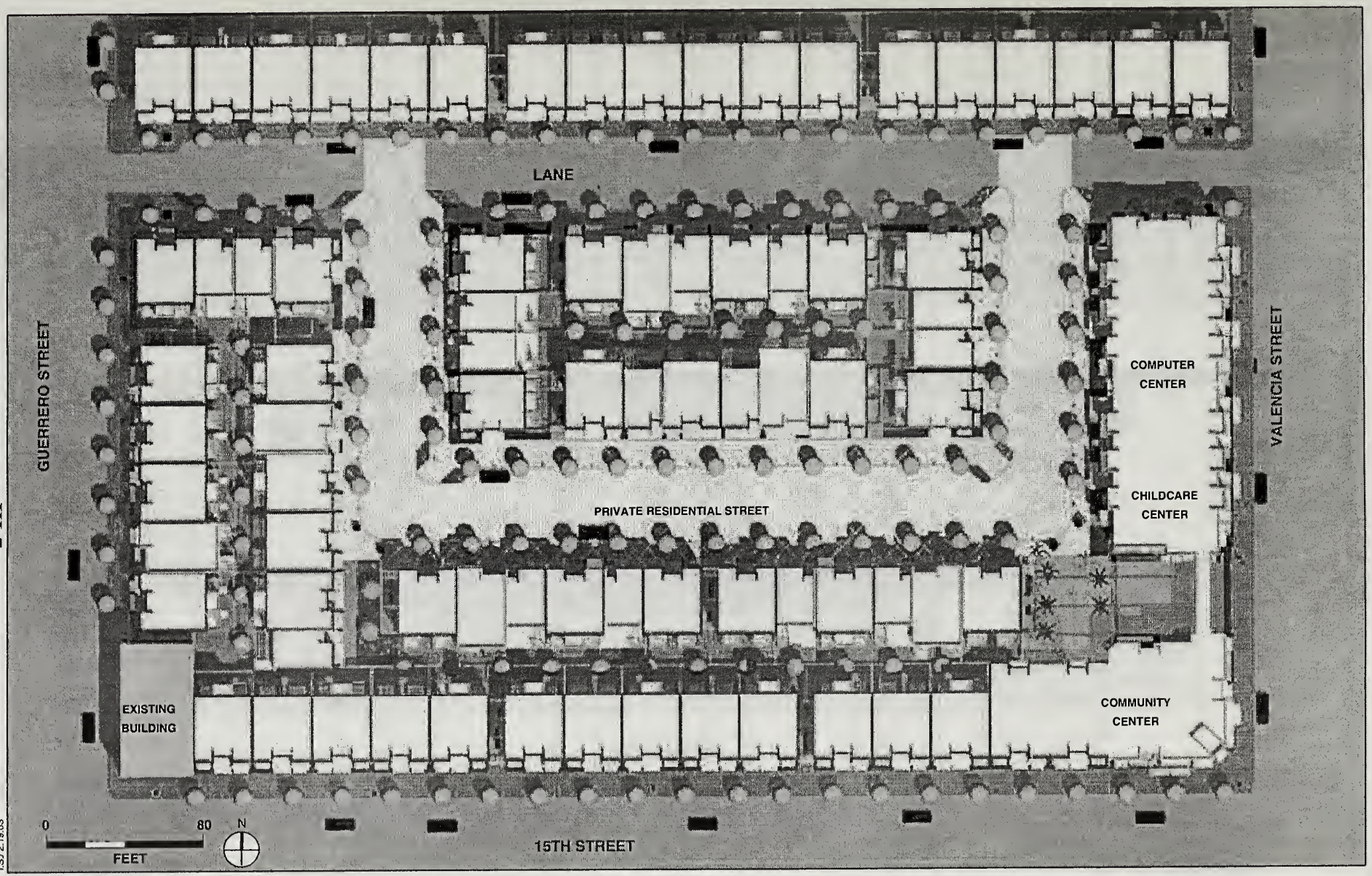
VALENCIA GARDENS HOPE VI PROJECT

FIGURE 1: PROJECT LOCATION

The proposed project would be designed with an architectural character intended to reflect the scale and style of structures in the surrounding neighborhood. All residential buildings except for the two buildings on Valencia Street would be oriented as walk-up apartments in street-facing row houses. The two buildings on Valencia Street would each have a residential entry elevator lobby and a ground story design that would reflect the commercial uses of that street. The project would include architectural features such as bay windows, varied rooflines and varied massing. The maximum height of the proposed buildings would be 48 feet. New streets would be introduced to create blocks similar to those in the surrounding Mission District neighborhood (see Figures 2 and 3). The new U-shaped interior street would have parallel surface parking on both sides and would connect with the new east-west through street at two points; the new streets would be designed for local residential traffic. The new interior street would include special paving to denote the increased level of pedestrian activity.

Along Valencia Street, the project would include street-level community spaces, management offices, and childcare center, with senior residences above. The community center would be at the corner of Valencia and 15th Streets (see Figure 2). A secured "front door" would be oriented toward this intersection. A semi-public plaza would be located west of the community center to provide a multi-function outdoor space for residents and their guests. The childcare center, which would front Valencia Street, would be adjacent to the community center, adjacent to the dedicated childcare open space; this open space would connect to the community plaza. A computer learning center, intended for training facilities and other resident uses, would be adjacent to the childcare center fronting Valencia Street.

The proposed project would provide 66 senior units, 15 one-bedroom, 114 two-bedroom, 83 three-bedroom, and 12 four-bedroom units. Except for the senior units along Valencia Street, all of the units would have private exterior access from the sidewalk, with most units sharing a stoop or entry terrace with one other unit. All of the units would face the public and private streets, with visible front doors and windows intended to provide "eyes on the street."

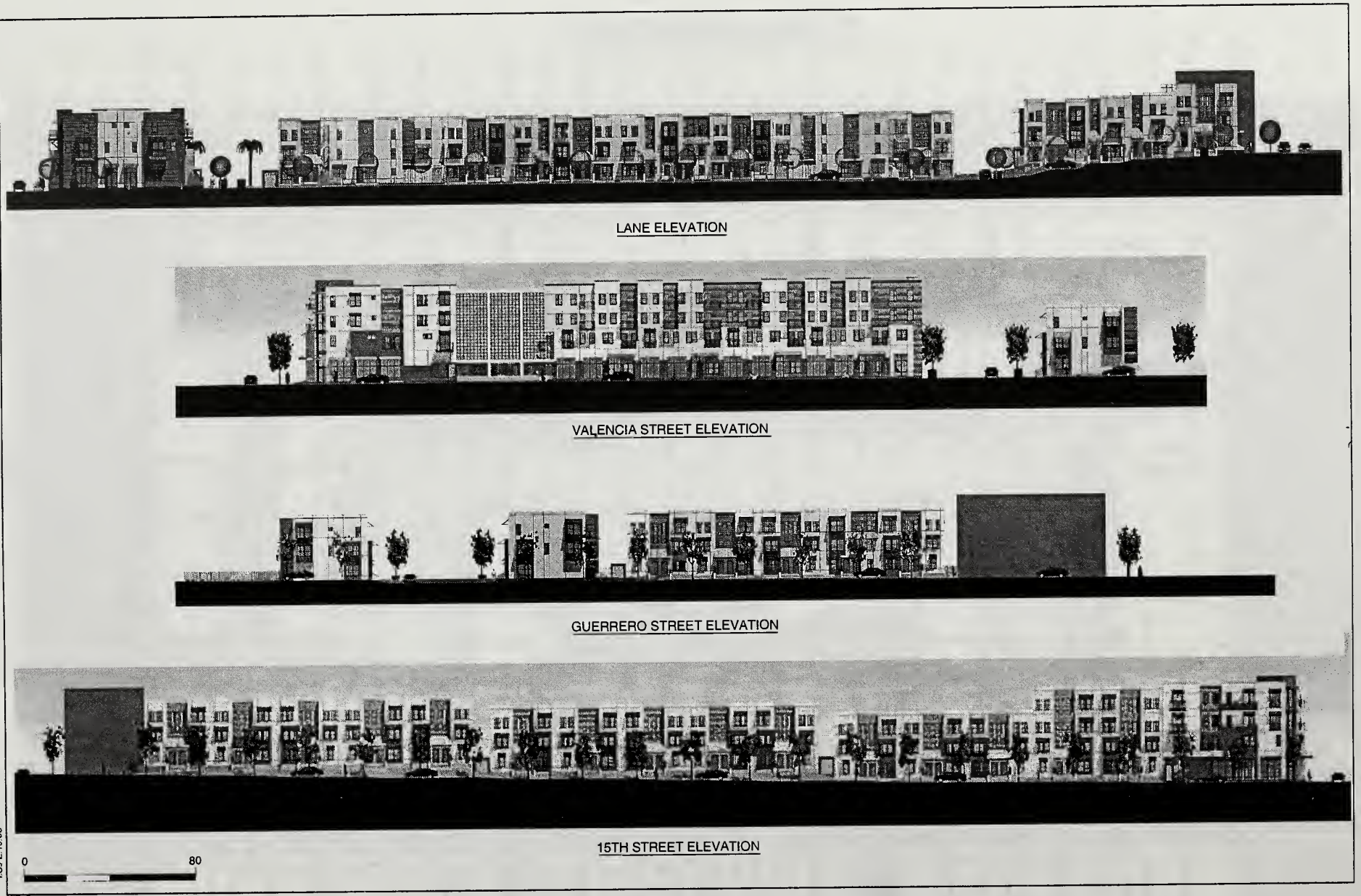


SOURCE: Van Mater Williams Pollack

I.S./2.19.03

VALENCIA GARDENS HOPE VI PROJECT

FIGURE 2: CONCEPTUAL SITE PLAN



I.S./2.19.03

SOURCE: Van Meter Williams Pollack

VALENCIA GARDENS HOPE VI PROJECT

FIGURE 3: CONCEPTUAL STREET ELEVATIONS

D. PROJECT SCHEDULE, COST, AND APPROVALS

PROJECT SCHEDULE AND COST

MHDC expects environmental review, project review and detailed design to be completed by Mid-2003. If the proposed project were approved and building permits issued, project construction is anticipated to commence in late 2003. During construction activities, Valencia Gardens residents would be temporarily relocated to existing housing sites within the San Francisco Bay Area. The Valencia Gardens Relocation Plan was submitted to and approved by HUD in 2000. As of January 2003, approximately 172 of the 246 units (70 percent of the units) have been vacated as part of that plan. The project would be constructed in a single phase requiring the relocation of all residents off site.

Construction would take about 24 months, with months 1-8 for demolition and excavation; months 9-20 for foundation construction and framing; and months 16-24 for interior installation, with planned occupancy for August 2005.

Demolition, site preparation, and construction costs are estimated at about $38.9 million (2002 dollars). The project architect is Van Meter Williams Pollack of San Francisco.

APPROVAL REQUIREMENTS

Following a public hearing on the Draft EIR before the City Planning Commission, responses to written and oral comments will be prepared. The EIR will be revised as appropriate and presented to the City Planning Commission with the Comments and Responses for certification as to its accuracy, objectivity, and completeness.

Discretionary project approvals would not be granted nor permits issues before the Final EIR is certified. The proposed project would require demolition and building permits from the Department of Building Inspection. The proposed project would require Conditional Use authorization from the Planning Commission to determine qualification as a Planned Unit Development (PUD) under Section 304 of the City Planning Code. A PUD allows for development of sites of considerable size (greater than one-half acre) as an integrated unit and

permits well reasoned modifications of certain provisions of the Planning Code such as parking, open space, rear yard, and bulk standards. The PUD application was submitted December 5, 2002.

The Project Sponsor is seeking federal funds from HUD through the SFHA. As part of the HUD process, the proposed project requires review pursuant to Section 106 of the National Historic Preservation Act. It is anticipated that SFHA and State Historic Preservation Office (SHPO) would enter into a Memorandum of Agreement to address the project's effects on historic properties, including the demolition of the existing structures and archaeological resources pursuant to Section 106. The information in these reports and this process is discussed in Chapter IV of this Draft EIR.

IV. ENVIRONMENTAL SETTING AND IMPACTS

An application for environmental evaluation for the project was filed July 17, 2002. On the basis of an Initial Study published November 9, 2002, the San Francisco Planning Department determined that an EIR was required. The Initial Study determined that the following effects of the project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included in the project and thus required no further analysis: land use, plans and zoning, visual quality, population, transportation, noise, air quality, utilities/public services, biology, geology/topography, water, energy/natural resources, hazards, and archeological resources. (The Initial Study has been included in Appendix A). Therefore, the EIR does not discuss those issues. The Initial Study also found that the project would have potentially significant impacts on historic resources and this issue is assessed in this chapter.

A. ARCHITECTURAL RESOURCES[1]

SETTING

PROJECT SITE

The Valencia Gardens Public Housing site is bounded by Valencia, Guerrero, 14th, and 15th Streets and consists of 246 residential units, community space, a computer learning center and property management facilities, a childcare center, community open space, and 82 surface parking spaces (see Figure 1, Project Location, page III-5). A fence surrounds the site limiting pedestrian access. Automobile access to the 82 surface parking spaces is from Valencia Street near 14th Street and Guerrero Street near 14th Street. Open space with limited landscaping and a playground area for the site are oriented within the three garden courtyards.

A review of previous inventories and studies has been performed by Carey & Co., an architectural resources consulting firm, to determine the presence of historically significant

[1] This Chapter is based Carey & Co. Inc. *Cultural Resources Report, Valencia Gardens HOPE VI Project, San Francisco, California,* May 7, 2003, which is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street.

architectural resources on, or in the vicinity of, the proposed project site.[2] As a result of this analysis, Valencia Gardens appears to be eligible for listing in the National Register of Historic Places. The history and architecture of the project site are discussed below.

Valencia Gardens, sponsored by the San Francisco Housing Authority (SFHA), was designed by well-known architects Harry Thomsen and William Wurster in 1941, and was completed by late spring of 1943 under the US Housing Authority's slum clearance program. The development is built of fireproof, reinforced, poured-in-place concrete. The exterior is painted concrete, the color of which has changed over time; murals have been added on some exterior walls. Figures 4a-4c include exterior photos of the existing Valencia Gardens.

The complex is comprised of twenty-two linked three-story buildings arrayed in a serpentine plan. Long groups of three buildings run from 15th Street on the south to a parking lot on the north, each one at a different elevation as the site slopes slightly down to the east. At the north end of the site, the long groups are each linked with buildings running east to west, while at the south end of the site only the four central long groups are similarly linked. This serpentine plan creates internal courtyards, enclosed on three sides. The three courtyards open to 15th Street are formal garden courtyards, while the two open to the north parking area are service yards. The courtyard features were designed by landscape architect Thomas Church and had rounded beds raised above low brick walls or pools (see Figures 4c and 4d). The landscaped courtyards featured seven sculptures by well-known San Francisco artist Beniemino (Benny) Bufano (see Figure 4d).

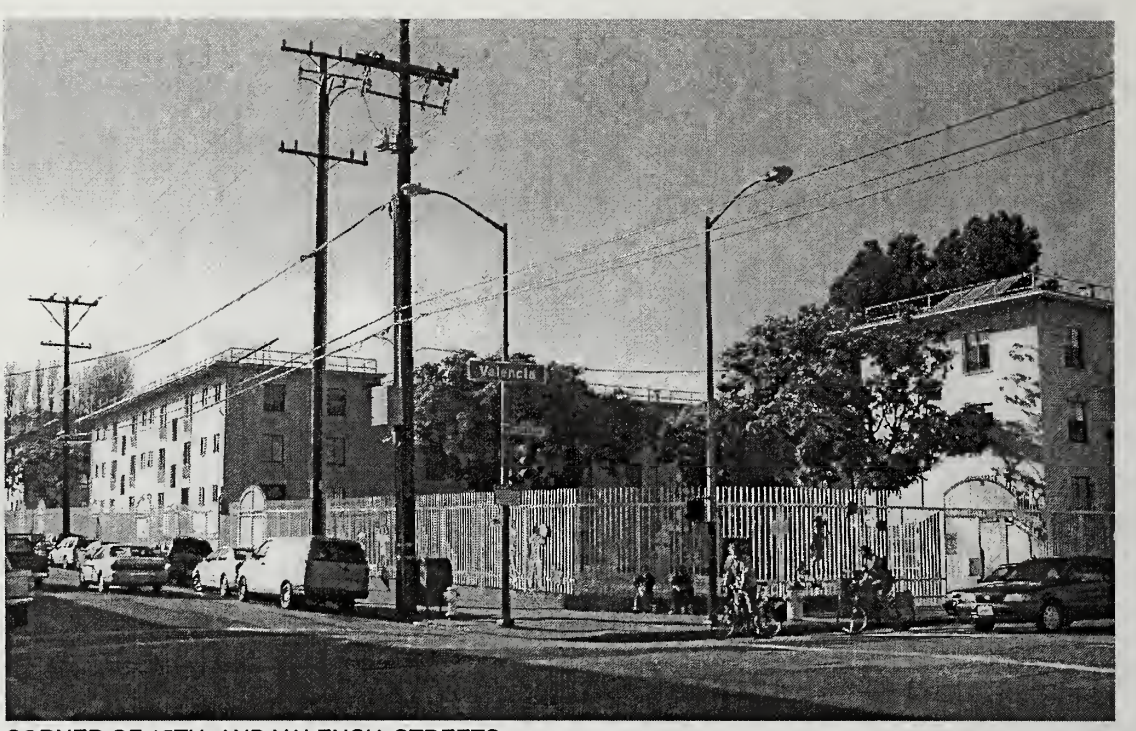
Congress passed the United States Housing Act in 1937, establishing the US Housing Authority (USHA) within the Department of the Interior. This Act allowed for the funding of local housing authorities (including the SFHA), established income limits for residents so that the neediest people would benefit from the program, mandated the elimination of slums insuring an increase in the quality, not quantity, of urban housing. The USHA mandated cost limits per units. In response to the constricted budgets, the designers looked to site planning,

[2] Carey & Inc., *Draft Historic Significance Evaluation, Valencia Gardens, San Francisco, California*, July 1997.

VIEW SOUTH ON GUERRERO STREET
SOURCE: EIP Associates

VIEW EAST ON 15TH STREET
SOURCE: EIP Associates

VALENCIA GARDENS HOPE VI PROJECT
FIGURE 4a: ARCHITECTURAL RESOURCES



CORNER OF 15TH AND VALENCIA STREETS
SOURCE: EIP Associates

VIEW NORTH ON VALENCIA STREET
SOURCE: EIP Associates

VALENCIA GARDENS HOPE VI PROJECT
FIGURE 4b: ARCHITECTURAL RESOURCES

VIEW WEST THROUGH PARKING AREA
SOURCE: EIP Associates

COURTYARD VIEW
SOURCE: Carey & Co.

COURTYARD WITH SCULPTURE
SOURCE: EIP Associates

BENNY BUFANO SCULPTURE
SOURCE: Carey & Co.

such as the use of the super-block or court plan as a way to make housing projects attractive and liveable without increasing costs. Valencia Gardens is an example of the court plan, using inward facing buildings at the perimeter of the site, creating spacious and protected inner courtyards.

Architect William Wurster has been widely recognized for his use of Bay Area architectural style and has been called the founder of the Bay Area regional school of architecture. Wurster has practiced with the firm of Wurster, Bernardi and Emmons and was once the head of the architecture school at the University of California at Berkeley. He was influenced by social and economic conditions during the 1930's and began to design smaller homes with amenities of larger homes. Soon after the on-set of the post-World War II housing boom, he became interested in designing innovative and affordable mass-produced homes with simple materials and flexible plans. Two themes that characterize his career are the minimum house and modern community planning. As an individual and with his firm, he was involved with projects in San Francisco such as the former Bank of America world headquarters, the Golden Gateway Center, Ghirardelli Square, and the Yerba Buena Gardens Housing. William Wurster also designed individual homes in California, including the Gregory Farmhouse in the Santa Cruz Mountains, the Church House in Pasatiempo, the Colby House in Berkeley, and the Clark Beach house in Aptos.

Landscape architect Thomas Church, who designed the landscaping at Valencia Gardens, was responsible for the design of over 2,000 residential gardens, housing developments, and corporate and college campuses. Church is considered a pioneer of modern landscape design. His commissions include the Memorial Court at the San Francisco War Memorial and Performing Arts Center in San Francisco, and the *Sunset* magazine headquarters in Menlo Park, California. Church used simplified traditional styles using inexpensive materials that required minimal maintenance to highlight indoor-outdoor living.

The animal sculptures at Valencia Gardens were sculpted by Beniemino (Benny) Bufano in the 1930s for the Works Progress Administration (WPA) project at Aquatic Park. The sculptures placed on permanent loan to Valencia Gardens include a section with household animals including mice and cat; marine life including two dolphins and two fish; and forest life with a

butterfly, a rabbit, and a bear with her cubs, which is well known and still is present at the project site. Other Bufano sculptures are at the Steinhart Aquarium in Golden Gate Park and outside the North Beach headquarters of the International Longshormen's and Warehousemen's Union (ILWU). Bufano's work is characterized by his use of granite, stainless steel and mosaic. In addition, he created stone sculptures to make political statements.

PROJECT VICINITY

The project site is in the Mission District of San Francisco. First developed during the Spanish/Mexican era (1776-1846), a small community surrounded Mission Dolores at what is now 16th and Dolores Streets. By the end of the 19th century the city and its major neighborhoods had expanded considerably, and the Mission District became a combination of undeveloped and developed land.

As a result of the fire following the April 1906 earthquake, all buildings in the project vicinity burned down. A post-earthquake construction boom began after the 1906 earthquake, and over half of the buildings now in the project vicinity date to the 1906-1920 period and were built in a late Victorian architectural style. Generally, these structures were three to four stories, with architectural details such as bay windows, wooden-sash, double-hung windows, cornices with dentils, false-front parapets, turned columns at the entrances and other wood detailing, and multi-colored paint schemes. Much of this development was residential in nature, particularly along 14th and Guerrero Streets, with some mixed residential/commercial buildings on 15th and Valencia Streets. The State Armory and Arsenal building at 1800 Mission Street went up at this time, as did the Sheet Metal Workers Union Hall at 224 Guerrero Street, and a small church at 449 14th Street.

Another 25 percent of the buildings seen today in the project vicinity were constructed in the 1920s. Most of these were residential/commercial or commercial uses, located on scattered open lots throughout the area. In general, development dating to this period consisted of attached buildings, three to five stories in height, designed in late Victorian or early Modern

styles. Early Modern architecture is similar to the late Victorian style, but with far less embellishment and often of stucco or brick with wood trim.

The economic downturn of the Depression and the outbreak of World War II dampened the building expansion of earlier years. Only three structures, of one- or two-story Modern commercial design, were constructed between 1930 and 1945. Having filled all available lots, these building represent the end of the post-1906 redevelopment of the area.

Construction of new buildings in the area around the project site did not begin again until about 1960. It was at this time that a large four-story Mid-Century Modern apartment building was constructed on the site of the former Building Trades Temple Association headquarters, at the corner of 14th and Guerrero Streets. Since then, a series of mostly small residential buildings have been constructed on lots in the area that previously held other structures. Today, development continues as primarily residential in-fill. Projects currently underway include a four-plus story buildings at the corner of 14th and Guerrero Streets, 15th and Guerrero Streets, and along Valencia near 15th Street. The character of the project vicinity continues to be residential with some residential/commercial or commercial uses, three to five stories in height, designed in primarily late Victorian style with some early Modern and Modern styles.

HISTORIC PRESERVATION REGULATIONS AND CRITERIA

Historic architectural surveys provide information about existing properties that may be of value to a community. Designation or listing on a registry or cultural and/or historical resources may occur if a building is found to be of value; designated or listing can also serve to alert potential developers of the public's interest in such properties through review by public boards and commissions. There are a number of surveys and lists of San Francisco structures that are considered to have attained a degree of architectural, historical, and/or contextual importance.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places (National Register) is the nation's master inventory of known historic resources. The National Register is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the National, State or local level.

Structures, sites, buildings, districts and objects over 50 years of age can be listed on the National Register as significant historic resources. However, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included on the National Register. The criteria for listing on the National Register include resources that:

A) are associated with events that have made a significant contribution to the broad patterns of history,

B) are associated with the lives of persons significant in our past,

C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work or a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or

D) have yielded or may likely yield information important in prehistory or history.

Section 106 of the National Historic Preservation Act requires the lead agency to determine whether the project site possesses historic significance; assess the impact of the undertaking on the historic resource and determine whether the impact is adverse; and if adverse, establish a consultation process with the President's Advisory Council on Historic Preservation (Advisory Council) and the State Historic Preservation Officer (SHPO) on the impact of the proposed project on the historic resource.

The survey prepared by Carey & Co. for the Section 106 review concludes that the Valencia Gardens complex is eligible for listing as a district on the National Register of Historic Places under Criterion A due to its association with the social and architectural history of public housing, and Criterion C because it is the work of a well-known Bay Area architect, landscape architect and sculptor, and embodies the distinctive characteristics of the Modern style

associated with the Bay Area.[3] The Valencia Gardens complex appears to fall under the category of district in that it possesses a significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically by plan or physical development.

In terms of integrity, the property is in its original location and continues to be used as public housing. The buildings remain virtually unchanged, and with the exception of the windows and areas of glass brick and new paint color schemes, the exterior of the buildings are virtually unchanged and are in fair condition. The building interiors, including floor finishes, kitchen fittings and bathroom fixtures have been replaced. The courtyards retain a very high degree of integrity, including the Bufano sculptures, and are in good condition.

As discussed below, buildings or districts determined to be eligible for the National Register are considered listed on the California Register of Historic Places. The CEQA definition of an historic resource includes structures determined eligible for listing in the California Register of Historical Resources, and a project is normally found to have a significant effect on architectural resources if it will substantially disrupt a property that has been determined to be an historic resource.

Properties in the Area of Potential Effect

The historic resources Area of Potential Effect (APE) is defined as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist," [36 CFR 800.2(c)]. The APE boundaries for Valencia Gardens was defined as properties adjacent to the project site, and the one to two additional properties to the east as to extend the APE to include the State Armory and Arsenal which is listed on the National Register of Historic Places. In addition, one property in the

[3] Carey & Co. Inc. *Cultural Resources Report, Valencia Gardens HOPE VI Project, San Francisco, California,* May 7, 2003, which is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street.

APE may become eligible for listing on the National Register when further architectural and historic research is performed, the Sheet Metal Workers Union Hall.[4]

The State Armory and Arsenal, San Francisco Landmark No.108, 1800 Mission Street, was listed on the National Register in 1978 for its architecture as "an outstanding example of the metropolitan armories built in the late Nineteenth and early Twentieth Century." While built from 1912 to 1914, the structure resembles a Medieval fortress with rough red/brown clinker brick exterior surface walls curve outward slightly toward the ground, long narrow slit windows, and four octagonal corner towers.[5]

The Sheet Metal Workers Union Hall, San Francisco Landmark No.150, 224 Guerrero Street, was built in 1906. It is a two-story, residential over commercial building, rectangular in plan. It is of wood-frame construction with a pressed sheet metal facade and a partially-tiled commercial space on the ground story. Based on their November 2002 survey, Carey & Co. conclude that when more research is performed for the property it may become eligible for listing on the National Register due to its potential architectural significance and/or connection to the neighborhood's labor history.[6]

California Register of Historic Places

The California Register of Historical Resources (California Register) includes buildings and structures formally determined eligible and/or listed through procedures adopted by the SHPO, and also includes buildings previously determined eligible for listing in the National Register. Valencia Gardens would be considered listed on the California Register if formally determined to be eligible for the National Register during the ongoing Section 106 process. The State Armory and Arsenal, by virtue of its listing in the National Register, is also listed in the California Register. If formally determined to be eligible for the National Register, the Sheet Metal Workers Union Hall and the apartments at 361 and 375 14th Street would also be listed

4 Carey & Co. Inc. *Cultural Resources Report, Valencia Gardens HOPE VI Project, San Francisco, California,* May 7, 2003, which is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street.

5 ibid.

6 ibid.

in the California Register; a formal request for determination for these buildings has not been made.

1976 Department of City Planning Citywide Survey

Between 1974 and 1976, the San Francisco Planning Department conducted a citywide inventory of the City's approximately 170,000 structures to determine their architectural importance. The physical appearance of both contemporary and older buildings were surveyed but historical associations were not included in the study. An advisory review committee of architects and architectural historians determined that 10,000 of these buildings were eligible for inclusion in the survey based upon various factors, including architectural design, urban design context, and overall environmental significance. These buildings represent roughly 10 percent of the City's entire building stock. Buildings included in the survey are rated from a low of '0,' contextually significant, to a high of '5,' highest overall significance.

In January 2003, the San Francisco Planning Department's computerized database indicated that Valencia Gardens was included in the 1976 Survey. However, the department was unable to provide additional detailed information on how the property was rated.

Three properties within the APE were rated in the 1976 Citywide Survey. The State Armory and Arsenal building and the apartments at 361 and 375 14th Street were rated a "3" and the Sheet Metal Workers Union Hall was rated a "4." In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2 percent of the City's architecture.

Article 10 of the City Planning Code

Article 10 of the City Planning Code provides for designation of landmark buildings and prevents the unnecessary destruction of "structures, sites, and areas of special character or special historical, architectural or aesthetic interest or value." Valencia Gardens is not a designated landmark in Article 10. Within the APE, two properties discussed above, the State Armory and Arsenal, Landmark No. 108, and the Sheet Metal Workers Union Hall, Landmark No. 150 are listed in Article 10. As Article 10 is an adopted local register of

historic resources, both of these buildings would be considered historical resources for the purposes of CEQA.

IMPACTS

SIGNIFICANCE CRITERIA

A project is normally found to have a significant effect on architectural resources if it will substantially disrupt or substantially adversely affect a property that has been determined to be an historical resource as per CEQA Section 21084.1 and CEQA Guidelines Section 15064.5. CEQA states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." This section further defines a "historical resource" as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources. In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and Article 11 of the San Francisco Planning Code, or (ii) is deemed significant due to its identification in an historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g), is presumed to be historically significant unless a preponderance of evidence demonstrates otherwise. A "substantial adverse change" is defined in Public Resources Code Sec. 5020.1 as "demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired."

DEMOLITION OF VALENCIA GARDENS PUBLIC HOUSING

Valencia Garden was designed by William Wurster and Harry Thomsen and completed in 1943. The buildings have been undergone minimal change over the last 60 years and are currently in fair condition. The SHPO is currently reviewing Section 106 documentation prepared for and submitted by San Francisco Mayors Office of Housing (MOH) and SFHA, including Carey & Co.'s determination that Valencia Gardens appears eligible for the National Register under Criterion A and C. For the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as though the existing Valencia Gardens buildings are an "historical resource." Therefore, the demolition of Valencia Gardens would then be "deemed significant" per CEQA

Section 21084.1. The proposed project would demolish all 22 existing residential buildings and would remove surface parking on the project site. Demolition would be a significant adverse effect of the proposed project on cultural resources.

OTHER HISTORIC RESOURCES

The proposed project would remove all the buildings and related features currently located on the site and construct a new housing development on that same site. There would be no direct impacts to historic resources or potential historic resources in the project vicinity. However, the potential exists for indirect impacts to adjacent sites attributable to demolition and construction activities for the proposed project. As the project site is bounded on three sides by streets (Guerrero, 15th and Valencia Streets) the project site is set back from other sites and at such a distance there would be a very low possibility of any impacts for construction activities associated with the proposed project. There would be no direct or indirect impacts to the State Armory and Arsenal or the Sheet Metal Workers Union Hall.

V. MITIGATION MEASURES AND IMPROVEMENT MEASURES

A. MITIGATION MEASURES

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the project. These measures have been adopted by the Project Sponsor and, therefore, are proposed as part of the project.

Mitigation Measures identified in this EIR or the Initial Study are discussed below. If a Mitigation Measure that was included in the Initial Study has been revised since the publication of the Initial Study, changes to the measures are indicated in underline. (The Initial Study is included in Appendix A.) Mitigation Measures identified in this Draft EIR and the Initial Study would be required by decision makers as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record.

ARCHITECTURAL RESOURCES

As discussed in Section IV.A, Architectural Resources (page IV-1) for the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an historic resource and its demolition would be a significant unavoidable impact on cultural resources. This significant unavoidable impact would be reduced (though not eliminated) through the implementation of the following mitigation measures:

4. Prior to any physical removal of buildings or site features, the Project Sponsor would prepare, or cause to be prepared, documentation of Valencia Gardens complex. Such documentation would include the precise recording of the structures through measurements, drawings, and photographs and would meet the Historic American Buildings Survey (HABS) recordation standards. The HABS documentation would include the following:

    - HABS outline report would be prepared and would include descriptive and historical information on the buildings, the architects, the landscaping, the landscape architect, the sculptures, and the artist. Information from the previous reports prepared including the *Valencia Gardens Draft Historic Significance Evaluation*, Carey & Co., 1997, and the *Verification of Historic Significance,*

Valencia Gardens HOPE VI Project, Carey & Co., 2002, would be used to fulfill some of the requirements for descriptive and historical information.

- Photographic documentation of the exterior of Valencia Gardens neighborhood setting, buildings, courtyards, landscape and site features, and sculptures would be prepared.
- Photographic documentation of selected interiors, including a typical dwelling unit, would be prepared. The selected dwelling unit would be appropriately described in the outline report and keyed to the photographs.
- All photographic documentation would follow the HABS Photographic Standards for detail and quality, use of large format photographs and negatives, archival processing, labeling, and sacrificial test prints. Two sets of archival prints and one set of archival negatives would be prepared.
- Existing architect's drawings of the housing complex would be included in the HABS documentation. Reference would be made in the documentation report to the repository where the drawings are housed.

2. The documentation of Valencia Gardens would be submitted to the following repositories:

- Documentation report, one set of photographs and negatives, and a copy of the original drawings (identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster") would be submitted to the History Room of the San Francisco Public Library.
- Documentation report would be submitted to the Northwest Information Center of the California Historical Resources Information Resource System.
- Documentation report, one set of photographs, original drawings, and rehabilitation drawings would be submitted to the Wurster, Bernardi & Emmons Collection, 1922-1974, Environmental Design Archives, in the College of Environmental Design, University of California, Berkeley. The original drawings are identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster." The rehabilitation drawings are identified as "Renovation Drawings for Kitchens and Bathrooms on 12-28-73 by the Housing Authority of the City and County of San Francisco." Both drawings sets are in the possession of the San Francisco Housing Authority and would be examined by a conservator prior to their donation.
- The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Planning Department for review prior to issuance of any permit that may be required by the City and County of San Francisco for demolition of Valencia Gardens.

- The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Landmarks Preservation Advisory Board.

3. The Project Sponsor would provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Valencia Gardens Housing Project. The interpretive display would also include information on why the existing Valencia Gardens housing is inappropriate for its current use as discussed in the HOPE VI application section on existing conditions, as well as published articles regarding the design goals of the HOPE VI program, and the design goals developed in the resident design workshops for Valencia Gardens, which together show how social thinking has changed regarding what is now considered appropriate public housing design. The interpretive display would be submitted to the San Francisco Landmarks Preservation Advisory Board for review and approval prior to issuance of a final certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The LPAB may appoint a liaison to work with the Project Sponsor in directing the research on the interpretive materials.

4. The Project Sponsor, along with the President of the LPAB, would work with the San Francisco Arts Commission to incorporate the Bufano sculptures into the proposed site design. Subject to Arts Commission approval, the Bufano sculptures would be returned to the project site after construction. Prior to removing the sculptures from the site, an art conservator would inspect each sculpture to determine their existing condition. A qualified mover with experience in moving fine art pieces would be contracted to move the sculptures to a storage facility during construction of the proposed project. The storage facility would be one recommended by the art conservator. The same moving company would move the sculptures back, and the art conservator would supervise their placement on the project site.

NOISE

5. The Project Sponsor shall require project construction contractor(s) to pre-drill holes to the maximum depth feasible on the basis of soil conditions. Contractors shall be required to use construction equipment with state-of-the-art noise shielding and muffling devices.

6. The Project Sponsor shall incorporate any noise mitigation measures identified in the Noise Assessment of the Special Environmental Clearance prepared according to HUD regulations (24 CFR Part 51, Subpart B).

AIR QUALITY

7. The Project Sponsor shall require the contractor(s) to spray the site with water during excavation and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks

hauling debris, soil, sand or other such material; and sweep surrounding streets during excavation and construction at least once per day to reduce particulate emissions.

8. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the Project Sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The Project Sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions from equipment that would be in frequent use for much of the construction period.

GEOLOGY

9. One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The Project Sponsor and its contractors shall follow the recommendations of the final geotechnical reports regarding any excavation and construction for the project. The Project Sponsor shall ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent buildings for damage during construction, if recommended by the geotechnical engineer.

10. If dewatering were necessary, the final soils report shall address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the soils report would determine whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the Project Sponsor to perform this monitoring. Instruments shall be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge shall be used to halt this settlement. The Project Sponsor shall delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street shall be born by the Project Sponsor.

    If dewatering were necessary, the Project Sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

11. The Project Sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems shall be modified as necessary in the event that substantial movements are detected.

WATER QUALITY

12. If dewatering were necessary, the Project Sponsor shall follow the recommendations of the geotechnical engineer or environmental remediation consultant, in consultation with the Bureau of Environmental Regulation and Management of the Department of Public Works, regarding treatment, if any, of pumped groundwater prior to discharge to the combined sewer system.

    If dewatering were necessary, groundwater pumped from the site shall be retained in a holding tank to allow suspended particles to settle, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works to reduce the amount of sediment entering the combined sewer system.

13. The Project Sponsor shall require the general contractor to install and maintain sediment traps in local storm water intakes during construction to reduce the amount of sediment entering the combined sewer system, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works.

HAZARDS

14. In addition to local, state, and federal requirements for handling hazardous materials and soil and groundwater containing chemical contaminants, the Project Sponsor shall enter into a remedial action agreement with the Department of Public Health pursuant to Health and Safety Code Section 101480 et seq. At a minimum, the Project Sponsor shall undertake the following work and any additional requirements imposed by the Department of Public Health under the agreement if soil samples for waste characterization and disposal acceptance indicate that chemical concentrations is the soil are above any of the U.S. EPA Preliminary Remediation Goals for Residential Soil (PRGs).

    a. The Project Sponsor shall implement a project specific health and safety plan (HSP) to be used during construction activities. The HSP shall address the safety and health hazards of the project and procedures for the protection of construction workers whom may be in contact with potentially contaminated soil. The HSP shall also specify site control programs, engineering controls, safe work practices, air monitoring requirements, and a description of proper personal protective equipment. The plan shall also include measure to minimize public exposure to potentially contaminated soil (i.e., dust). Such measures would include dust control, appropriate site security, restriction of public access, and posting of warning signs.

       If contaminated soils are encountered during earth-moving activities, these soils shall be disposed of off-site in accordance with California hazardous waste disposal regulations (CCR Title 26) or shall be managed in place with approval of the California Department of Toxic Substances Control (DTSC), the

Regional Water Quality Control Board (RWQCB), or the San Francisco Department of Public Health (DPH).

b. Prior to any demolition or excavation at the project site the Project Sponsor shall conduct surveys to identify any potentially hazardous materials (e.g., asbestos, lead-based paints, PCBs, mercury) in existing buildings or building materials. At a minimum, these surveys shall identify any hazardous materials that would require removal and disposal prior to demolition. These surveys shall be completed by a Registered Environmental Assessor or a similarly qualified individual.

c. All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and any other agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the Project Sponsor shall submit to the San Francisco Planning Department and the San Francisco Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report shall be certified by a Registered Environmental Assessor or a similarly qualified individual who states that all necessary mitigation measures have been implemented.

ARCHAEOLOGICAL RESOURCES

15. Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The Project Sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archeology. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (Archeo-Tec., *From Bull Fights to Baseball: Archaeological Research Design and Treatment Plan for the Valencia Gardens HOPE VI Project*, December 2002) at the direction of the Environmental Review Officer (ERO). In instances of any inconsistency between the requirements of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirement of the latter shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four

weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archaeological Testing Program. The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the Project Sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or

B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archaeological Monitoring Program. If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program shall be implemented the archaeological monitoring program shall minimally include the following provisions:

- The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological

monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;

- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;
- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program. The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program.
- Security Measures. Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.
- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, Project Sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the human remains are not Native American, the archaeological consultant will notify the Roman Catholic Archdiocese of San Francisco who will be afforded a reasonable time to make recommendations to the Project Sponsor and consultant for the treatment and disposition of the remains and associated burial items. Following consultation with the Roman Catholic Archdiocese, a procedure for the treatment of non-Native American human remains and associated burial items that may include the preservation, removal, analysis, curation, or reinternment of the human remains and/or associated burial items will be formulated and implemented.

Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the

historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

B. IMPROVEMENT MEASURES

Improvement Measures identified in this Draft EIR or in the Initial Study to reduce effects of the project that are identified in the environmental analysis as being less-than-significant impacts are listed below.

Improvement Measure 1. Loading

To accommodate large truck deliveries, particularly for move-ins, the building management shall work with tenants to schedule large deliveries and block off on-street parking spaces in the private street with cones for loading activities. To accommodate passenger loading for the childcare use, two on street parking spaces on Valencia shall be designated a passenger loading zone during the morning drop-off and afternoon pick up periods. This shall be accomplished though Project Sponsor coordination with the DPT.

Improvement Measure 2. Limit Construction Movement of Off-Peak Hours

Any construction traffic occurring between 7:00 AM and 9:00 AM or between 3:30 PM and 6:00 PM would coincide with peak hour traffic and could impede traffic flow. The impact of lane closures and construction traffic would decrease the capacity of streets and slow the movement of traffic (including MUNI buses). To the extent possible for future projects in the study area, truck movements shall be limited to the hours between 9:00 AM and 3:30 PM to minimize disruption of the general traffic flow on adjacent streets.

Improvement Measure 3. Coordinate with City Departments to Reduce Traffic and Pedestrian Impacts During Construction

The Project Sponsor and construction contractor shall meet with the Traffic Engineering Division of the Department of Parking and Traffic and the Fire Department to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of the project. In addition, to ensure that construction activities do not impact Muni bus stops or routes in the area, the Project Sponsor shall coordinate with Muni's Chief Inspector prior to construction.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21100 (b)(2)(A) and 21100.1(a) of the California Environmental Quality Act (CEQA), and Section 15126.2(b) of the State CEQA Guidelines, the purpose of this chapter is to identify significant impacts that could not be eliminated or reduced to an insignificant level by implementing mitigation measures included as part of the project or by other mitigation measures that could be implemented, identified in Chapter V, Mitigation Measures, page V-1. This chapter is subject to final determination by the Planning Commission as part of the certification process for the EIR. If necessary, this chapter will be revised in the Final EIR to reflect the findings of the Planning Commission.

For the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an "historical resource." The demolition of Valencia Gardens would then be "deemed significant" per CEQA Section 21084.1. The proposed project would demolish all 22 existing residential buildings and would remove surface parking on the project site. Demolition would be a significant adverse effect of the proposed project on cultural resources. Mitigation Measures to reduce (but not eliminate) this significant impact to historic architectural resources are included in Chapter V.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with these alternatives. The project decision-makers could approve an alternative instead of the proposed project, if that alternative would reduce or eliminate significant impacts of the project and is determined feasible. The determination of feasibility will be made by project decision-makers on the basis of substantial evidence in the record, which shall include, but not be limited to, information presented in the EIR and in comments received on the Draft EIR.

Alternatives were selected that would reduce identified impacts of the proposed project; however, none of the alternatives would meet all or most of the Project Sponsors' objectives. The following alternatives were identified in the Initial Study (included in Appendix A), and are evaluated in this chapter: a No Project Alternative and a Preservation/Rehabilitation Alternative. As discussed in Section IV.A, Architectural Resources, for the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an historic resource and its demolition would constitute a significant impact.

No alternative sites have been identified within San Francisco where the project could be constructed, and the Project Sponsor's objectives could be met. The proposed project would use federal funding awarded through the HOPE VI program, which aims to revitalize public residential developments and reintegrate them into the community fabric through public/private partnerships. HOPE VI funds must be used on existing public housing sites. The SFHA proposes to replace Valencia Gardens instead of another public housing development in San Francisco because of the poor and dangerous conditions of the existing buildings. Furthermore, the SFHA owns and controls the entire project site, making it a feasible location for implementing a large-scale, mixed-use/mixed-income public housing development.

CEQA requires the identification of the environmentally superior alternative in an EIR. For the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an "historical

resource," therefore the Preservation/Rehabilitation Alternative, Alternative B, would be the environmentally superior alternative.

A. ALTERNATIVE A: NO PROJECT

DESCRIPTION

The No Project Alternative would entail no change to the site. The proposed project – to replace the existing Valencia Gardens buildings with 15 three-story buildings and two four-story buildings containing 290 residential units, a community center, a childcare center, a computer learning center, an outdoor child play space, and other semi-public community space, and 86 surface parking spaces, would not be implemented. The existing 22 three-story residential buildings containing 246 residential units, community space, a computer learning center and property management facilities, a childcare center, community open space, and 82 surface parking spaces would not be demolished and none of the existing architectural features would be altered.

IMPACTS

If the No Project Alternative were implemented, none of the impacts associated with the proposed project would occur. The environmental characteristics of this alternative would be generally described in the environmental setting section of Chapter IV and the Initial Study (see Appendix A). The existing 22 buildings would not be demolished, and existing population, transportation, cultural resources, and geologic conditions would not change. Future transportation conditions described as base conditions with cumulative development (see the Initial Study) would occur, but without the proposed project. This alternative would not meet MHDC's or the SFHA's goals to continue to provide affordable housing opportunities and decrease the concentration of public housing units; provide unit types to best meet the needs of families and seniors in affordable housing; provide economically sustainable supportive services for its residents as well as the community; remediate the physical hazards of the existing Valencia Gardens, including soil stabilization; blend into the surrounding

community; and improve public housing facilities, amenities, security, and ADA access at the site.

As noted in Section IV.A, Architectural Resources, the existing buildings are in fair condition, and without removal or other changes those conditions would be expected to continue to deteriorate with the No Project Alternative. Existing problems with security, privacy, building system obsolescence, earthquake safety, open space, poor unit design, and institutional building design not integrated with the neighborhood would be expected to remain.

A No Project Alternative would also cause the SFHA to forfeit use of its HOPE VI funding, awarded by the HUD for the purpose of revitalizing Valencia Gardens. The loss of federal funding would limit SFHA's ability to revitalize and increase the supply of affordable housing in San Francisco.

B. ALERNATIVE B: PRESERVATION/REHABILITATION OF EXISTING BUILDINGS

DESCRIPTION

Alternative B, Preservation/Rehabilitation of Existing Buildings, would preserve the Valencia Gardens buildings in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Restructuring Historic Buildings* (the *Standards*). The *Standards* are the primary document used by a broad range of government entities and private sector organizations to plan and evaluate the treatment of historic buildings. The introduction to the Standards states that they are "neither technical nor prescriptive, but are intended to promote responsible preservation practices. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed." In other words, the *Standards* provide a framework, and are intended as a planning and guidance.

Alternative B, which would retain the defining exterior characteristics of the existing buildings, would be considered generally consistent with the *Standards*. This alternative

would preserve the exterior of the buildings while substantially upgrading the interiors to conform with current seismic, life safety and other building code requirements for residential use. The Preservation/Rehabilitation Alternative would preserve the defining exterior characteristics of the existing buildings, including the serpentine layout of buildings, garden courtyards and service courtyards, restore original landscaping, and sculptures within the courtyards.

IMPACTS

The Preservation/Rehabilitation Alternative would retain and restore important exterior architectural features and would avoid the proposed project's potentially significant impact to historic resources associated with demolition of the existing buildings. As discussed in Section IV.A, Architectural Resources, for the purposes of CEQA, Valencia Gardens is treated in this Draft EIR as an "historical resource," and its demolition would be considered a significant impact for the purposes of CEQA.

The Preservation/Rehabilitation Alternative would rehabilitate 246 units in the existing buildings, whereas the proposed project would develop up to 290 new units. The new units would provide include a greater number of larger units for families and units for seniors, and as a result the population on the site would increase from approximately 623 to 1,244. Compared to the proposed project, the Preservation/Rehabilitation Alternative would also limit the uses at the site, not expanding the childcare facility or computer learning center. The other environmental characteristics of this alternative would be generally as described in the environmental setting sections in Chapter IV and the Initial Study (see Appendix A). The existing 22 buildings would not be demolished, and existing population, transportation, cultural resources, and geologic conditions would not change.

As with the No Project Alternative, the Preservation/Rehabilitation Alternative would not meet MHDC's or the SFHA's goals to provide unit types to best meet the needs of families and seniors in affordable housing; provide economically sustainable supportive services for its residents as well as the community; remediate the physical hazards of the existing Valencia Gardens, including soil stabilization; blend into the surrounding community; and improve

public housing facilities, amenities, security, and ADA access at the site. Alternative B would instead preserve the inherent architectural design and arrangement of the existing buildings, characterized as having problems with security, privacy, building system obsolescence, open space, poor unit design, institutional and not integrated with the neighborhood. While the Preservation/Rehabilitation Alternative would substantially upgrade the interior of the buildings, existing floor plans, window patterns and other features are considered by the SFHA to limit the upgrade potential.

The Preservation/Rehabilitation Alternative was previously explored by MHDC, SFHA and Valencia Garden residents in November 2000. In addition to evaluating how a preservation alternative and a new construction alternative would meet project goals, the cost of each alternative was estimated. While not an environmental issue, MHDC found that a preservation alternative would cost approximately 8 percent more than the proposed project, making it more cost effective to demolish and rebuild the residential development using HOPE VI funding.

VIII. DRAFT EIR DISTRIBUTION LIST

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Dorice Murphy
President
Eureka Valley Trails/Art Network
175 Yukon Street
San Francisco, CA 94114-2306

MEDIA

Associated Press
Attn: Bill Shiffman
1390 Market Street, Suite 318
San Francisco, CA 94102

San Francisco Bay Guardian
520 Hampshire Street
San Francisco, CA 94110

San Francisco Chronicle
Attn: Elliot Diringer
925 Mission Street
San Francisco, CA 94103

San Francisco Business Times
Attn: Tim Turner
275 Battery Street, Suite 940
San Francisco, CA 94111

Patrick Hoge
City Hall Bureau
San Francisco Chronicle
901 Mission Street
San Francisco, CA 94103

San Francisco Examiner
988 Market Street
San Francisco, CA 94102

The Sun Reporter
1791 Bancroft Avenue
San Francisco, CA 94124-2644

San Francisco Independent
Attn: City Desk
1201 Evans Avenue
San Francisco, CA 94124

LIBRARIES

Government Information Services
San Francisco Main Library, Civic Center
San Francisco, CA 94102

Stanford University Libraries
Jonsson Library of Government Documents
State & Local Documents Division
Stanford, CA 94305

Government Publications Department
San Francisco State University Library
1630 Holloway Avenue
San Francisco, CA 94132

Hastings College of the Law Library
200 McAllister Street
San Francisco, CA 94102-4978

Institute of Government Studies
109 Moses Hall
University of California
Berkeley, CA 94720

Inter-Office 41
SF Pub Library Gov Info Ctr
100 Larkin St
San Francisco CA 94102

IX. REPORT PREPARERS AND PROJECT SPONSORS

EIR AUTHORS

Planning Department, City and County of San Francisco
1660 Mission Street
San Francisco, California 94103

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EIR CONSULTANTS

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460 Bush Street,
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Architectural Historian:	Sarah M. Dreller

PROJECT SPONSORS

Mission Housing Development Corporation
474 Valencia Street, Suite 280
San Francisco, California 94103

San Francisco Housing Authority
1815 Egbert Avenue
San Francisco, California 94124

X. SUMMARY OF COMMENTS AND RESPONSES

A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (EIR) prepared for the Valencia Gardens HOPE VI Project, and responses to those comments. Also included are staff-initiated text changes to the EIR.

All substantive comments made at the Draft EIR public hearing before the Planning Commission on April 24, 2003, are presented herein by direct quotation, edited to delete repetition and non-substantive materials only. The comments made at the Draft EIR public hearing before the Landmarks Preservation Advisory Board on April 16, 2003, were made only by the Board, formalized in a letter, and are presented herein by direct quotation. There were no additional written comments received during the Draft EIR public review period from March 22, 2003, to April 29, 2003.

Comments and responses are grouped by issue. Each group of comments is followed by its set of responses. Responses generally provide clarification of the Draft EIR. They occasionally include changes in, or additions to, the text of the Draft EIR. These modifications are indented and bolded within the response to make them easily discernible. Newly inserted words and phrases are underlined, as are new sentences that are incorporated into existing text. Text that is deleted is noted with ~~strike-through~~. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than on group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided. Some comments do not pertain to physical environmental issues, but responses are included for informational purposes.

The public hearing transcript and a copy of a letter received during the public review period are contained in Appendix C. The background documentation for this EIR, the original of the comment letter, and the public hearing transcripts are contained in Case File 2002.0809E, available for public review by appointment at the Planning Department, 1660 Mission Street, San Francisco.

B. LIST OF COMMENTORS

The following individuals provided oral testimony at the Planning Commission public hearing on April 24, 2003:

Judy Berkowitz
Kenneth Jones
Gabrielle Fontanella

The Landmark Preservation Advisory Board (LPAB) held a public hearing on April 16, 2003 on the Valencia Gardens HOPE VI Project Draft EIR. Based on the LPAB's discussion at that hearing, Tim Kelley, President, Landmarks Preservation Advisory Board, submitted a comment letter.

Besides the letter from the LPAB, no written comments were submitted during the public comment period of March 22, 2003, through April 29, 2003.

C. COMMENTS AND RESPONSES

1. Parking

Comment

Table 3 on page II-7 of the Draft EIR shows that the current population on the site is 623. The current parking is 82. The proposed population doubles to approximately 1,200, but the parking only increases to 86. As has been seen with another nearby public housing project, the Bernal Dwellings, the tenants in public housing do own cars, and Bernal Dwellings was built totally without off-street parking, much to its detriment now. There is indeed a great demand for parking in public housing projects. Doubling the population without increasing the parking will cause a detriment to the health, environment and well-being of all concerned, both the tenants in the building and the nearby merchants and residents. It will increase noise, congestion and emissions. *(Judy Berkowitz)*

Response

Project parking conditions are discussed on page A-19 of the Initial Study, Appendix A of the EIR, as well as in two Memoranda by CHS Consulting Group cited on page II-8 of the EIR, which are available for public review by appointment at the Planning Department. As discussed on page II-9 of the EIR, the proposed project would be a Planned Unit Development

(PUD), which is required to provide parking based on demand. Parking demand calculation for both the existing and proposed uses were based on the rates provided in *Parking Demand for Affordable Housing in San Francisco* published by the San Francisco Planning Department, and is determined based on the number of types of units (senior units, 1 bedroom/studio units, and 2 plus bedroom units), and not directly the population of the site. The table below shows the calculation of parking demand for each type on unit; this is Table 6, Net New Parking Demand, from Revisions to Valencia Gardens Development Program, CHS Consulting Group, February 14, 2003.

Use	Size	Rate	Parking Demand
Senior Housing	66 units	1/5 units	13
1 Bedroom	15 units	0.45/unit	7
2+ Bedroom	209 units	0.92/unit	192
Childcare Facility	3,500 gsf	--	7
Total Parking Demand			**219**

Source: CHS Consulting Group, February 14, 2003.

As noted on page A-21 to A-22 of the Initial Study, Appendix A of the EIR, the existing parking demand is 117 spaces, the supply is 82 spaces, and as such there is a shortfall of 95 spaces. The proposed project has a demand of 219 spaces, would supply 86 spaces, and such there is a short fall of 133 spaces. The proposed project would result in a net shortfall of approximately 38 parking spaces (133 – 95). As the proposed project would not meet the parking demand, the project sponsor would require authorization for the Planning Commission for an exception under the PUD as per Section 304 of the Planning Code.

As noted on pages A-21 to A-22 of the Initial Study, Appendix A of the EIR, the actual parking demand and shortfall at the site could be less than that calculated using the City's Transportation Analysis Guidelines' rates because vehicle ownership data from the project

sponsor indicates a relatively low ownership rate (38 percent, based on 76 cars out of 201 occupied units in April 2001, based on an e-mail from Lisa Pagan, Mission Housing Development Corporation, September 19, 2002) at Valencia Gardens.

As discussed on page A-22 of the Initial Study, Appendix A of the EIR, parking supply is not considered to be a part of the permanent physical environment in San Francisco; deficits are considered to be social effects, rather than impacts on the physical environment as defined by the California Environmental Quality Act (CEQA), and are thus not considered as a significant impact.

Potential secondary effects, cars driving and looking for a parking space in areas of limited parking supply, are also discussed in the Initial Study. This is typically a temporary condition, often offset by a reduction in vehicle trips by others who are aware of constrained parking conditions in a given area. Hence, any impacts would likely be minor, difficult to predict, and speculative.

2. Historic Resources

Comment

The document fails to consider the extremely consequential issues of social history that pertain to public housing both nationally and locally, and that are essential points to be understood about the demolition of Valencia Gardens.... The Statement of Significance for Valencia Gardens should be augmented by a scholarly examination of the social history of the housing development, including how social thinking has changed so that the buildings are now considered inappropriate as housing, as well as an exploration of racial exclusionary policies over the history of these buildings and how that too has changed. *(Tim Kelley, President, Landmarks Preservation Advisory Board)*

The Landmarks Board recommends that the statement of significance for the area immediately surrounding Valencia Gardens be supplemented to include the context of the effect of the construction of Valencia Gardens on its original character. *(Tim Kelley, President, Landmarks Preservation Advisory Board)*

Response

The historic context of the neighborhood surrounding Valencia Gardens is discussed on pages IV-8 and IV-9 of the Draft EIR, and the description of the existing Valencia Gardens is

included on page IV-1 of the Draft EIR. The Draft EIR generally discussed the change over time in cultural and architectural character in the vicinity. The existing Valencia Gardens housing development was found to be an historic resource for the purposes of CEQA with the information provided in the Draft EIR and the *Cultural Resources Report* background documentation by Carey & Co. Additional information on the social history of the surrounding area of Valencia Gardens, although interesting, would not be necessary to evaluate the impacts of the proposed HOPE VI Project on the area's historic resources.

Under California Public Resources Code Section 21060.5, "environment" means "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance." The social history of public housing and possible previous impacts on the social fabric of the neighborhood as a result of the original Valencia Gardens is a social effect, rather than impacts on the physical environment as defined by CEQA. CEQA Guidelines Section 15131 state that economic or social effects of a project shall not be treated as significant effects on the environment. Economic or social effects of a project may be used to determine the significance of physical changes caused by a project, for example the physical change of construction of a new large housing development may divide a community, and the social effect on the community would be the basis for determining that the effect would be significant. As discussed on page A-14 of the Initial Study, Appendix A of the EIR, the proposed project is the replacement construction of Valencia Gardens; it would not disrupt or divide the physical arrangement of an established community.

As part of the recognition of the history of public housing at Valencia Gardens, revisions to Mitigation Measure 3, included in Staff-Initiated Text Changes, the publicly accessible interpretive display area would incorporate information which would show how social thinking has changed regarding what is now considered appropriate public housing design.

Comment

The Landmarks Board recommends a copy of the original plans for Valencia Gardens be donated to the San Francisco History Room of the Public Library *(Tim Kelley, President, Landmarks Preservation Advisory Board)*

Response

The text of the Draft EIR has been revised to address this issue. Please see the revised Mitigation Measure 2 included in Staff-Initiated Text Changes on page C&R-12.

Comment

Proposed Mitigation Measure 3 (page V-3) for the identified significant unavoidable impact of demolition of Valencia Gardens should be amended to include the following specific requirement:

> The Project Sponsor will provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Valencia Gardens Housing Project. The documentation report, non-archival photographs, and interpretive display shall be submitted to the San Francisco Landmarks Preservation Advisory Board for review and approval prior to the issuance of a certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The Landmarks Preservation Advisory Board may appoint a liaison to work with the Project Sponsor in directing the research on the interpretive materials. *(Tim Kelley, President, Landmarks Preservation Advisory Board)*

Response

The text of the Draft EIR has been revised to address this issue. Please see the revised Mitigation Measure 3 included in Staff-Initiated Text Changes on page C&R-12.

3. Support for Project

The following comments generally address the merits of the project and do not raise questions about environmental content or adequacy of the EIR itself. They are included for informational purposes.

Comment

As a director at Mission Housing Development Corporation, project sponsor, I wanted to say we're pleased to be here before you and are ready to hear both the public's comments and your comments about the project. We and the tenants are very excited about this project. Mission Housing is a 30 year old organization whose offices are half a block away. We're a responsible neighborhood development organization and look forward to working with you on this. *(Kenneth Jones)*

I am Valencia Gardens' Resident Council Secretary, and have been a resident since July of 1958. I love the area. I live on the Guerrero Street side of the site, and I walk down one block and I catch the 26 MUNI line, I walk up two blocks on Guerrero and there's the F Market, or I can go catch BART and get anywhere in the city. This project needs to go forward as soon as possible. *(Gabrielle Fontanella)*

The Landmarks Board concurs with the Project Description, the description of Alternatives, and the assessment of impacts on Identified Historic Resources... In general, the Landmarks Board believes this is a worthy and necessary project, and that it should proceed as expeditiously as possible. *(Tim Kelley, President, Landmarks Preservation Advisory Board)*

D. STAFF-INITIATED TEXT CHANGES

This section presents the staff-initiated text changes that have been made to the Draft EIR. Non-substantive typographical errors have been corrected. Other clarifications or revisions are noted as follows:

1) On April 16, 2003, the Landmarks Preservation Advisory Board (LPAB) reviewed both the Section 106 Documentation and the Draft EIR for the proposed project. They discussed the Section 106 Documentation, and then directed staff to apply that discussion and comments to the Draft EIR as well. (A letter dated April 29, 2003, to Paul Maltzer provides the Landmark Preservation Advisory Board comments on the Draft EIR; those comments are responded to above.) LPAB comments on the Section

106 Documentation and associated Memorandum of Agreement will be addressed through the Section 106 and the National Environmental Policy Act (NEPA) processes. Specifically, additional information in the form of Department of Parks and Recreation (DPR) forms 523B on properties within the APE was to be provided. This additional information does not change the conclusions under the (CEQA) that Valencia Gardens is an historic resources and that the demolition of Valencia Gardens would be a significant adverse effect.

DPR forms were completed by Carey & Co. on May 7, 2003. To keep project information consistent, the Carey & Co. document, *Cultural Resources Report, Valencia Gardens HOPE VI Project, San Francisco, California, February 25, 2003,* has been updated to include this expanded research. The revised report, dated May 7, 2003, is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street. Revisions include:

- Expanded and/or revised DPR 532A and DPR 532 forms.
- Several property addresses, the expanded DPR forms are based on parcel numbers and as a result some property addresses have shifted or been combined.
- A revised Table of Survey Results for Properties Within the Project Vicinity to reflect the research in the DPR forms.
- Discussion of the apartments at 361 and 375 14th Street, with the additional research performed for the DPR forms, they are no longer found to be potentially individually eligible for listing on the NRHP.
- Minor additions to Architectural Resources Mitigation Measures.

2) The following information is added to the EIR because of additional research performed by Carey & Co.:

a.) Footnote 1 on Draft EIR page IV-1, footnote 3 on Draft EIR page IV-11, and footnotes 4-6 on Draft EIR page IV-12 have been revised as follows to reflect the updated Cultural Resources Report:

[1] This Chapter is based Carey & Co. Inc. *Cultural Resources Report, Valencia Gardens HOPE VI Project, San Francisco, California,* ~~February 25~~ May 7, 2003, which is

available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street.

b.) The last sentence of the first paragraph under Properties in the Area of Potential Effect on Draft EIR page IV-11 has been revised as follows to reflect the additional research completed which concludes that the apartments at 361 and 375 14th Street are not associated with the Armory and are not eligible for listing on the National Register.

In addition, ~~two properties~~ one property in the APE may become eligible for listing on the National Register when further architectural and historic research is performed, the Sheet Metal Workers Union Hall ~~and the apartments at 361 and 375 14th Street.~~

c.) The final paragraph on Draft EIR page IV-12 has been deleted to reflect the additional research completed which concludes that the apartments at 361 and 375 14th Street are not associated with the Armory and are not eligible for listing on the National Register.

~~The apartments at 361 and 375 14th Street, built about 1925, are rectangular in plan, with identical but mirrored designs. Each apartment features a ground-story garage area topped by two stories of apartments, a flat roof, stucco cladding on the ground story, and a combination of stucco and brick on the upper stories. Based on their November 2002 survey, Carey & Co. conclude that given this property's proximity to the Armory and its architectural elaboration, it may become eligible to the National Register if additional research into its history were to discover qualifying association with the Armory.~~[1]

d.) The last sentence on Draft EIR page IV-15 has been revised to reflect the additional research completed which concludes that the apartments at 361 and 375 14th Street are not associated with the Armory and are not eligible for listing on the National Register. They are not potential historic resources in the project vicinity and should not be called out in this section.

There would be no direct or indirect impacts to the State Armory and Arsenal~~,~~ or the Sheet Metal Workers Union Hall~~, or the apartments at 361 and 375 14th Street~~.

3) Mitigation Measures addressing impacts to architectural resources, contained both in the Summary Chapter beginning on page I-5, and in Chapter V, Mitigation Measures, beginning on page V-1, have been revised as noted below to reflect the comments of the LPAB. (While there are only some changes to the Architectural Resources Mitigation Measures section of the Draft EIR, the mitigation as a whole has been included below. Newly inserted words and phrases are underlined, as are new sentences that are incorporated into existing text. Text that is deleted is noted with ~~strike through~~.) However, the Mitigation Measures addressing architectural and archaeological resources may continue to be expanded through the Section 106 process. The final version of these Mitigation Measures would be confirmed upon in the Memorandum of Agreement (MOA), which is required for the proposed project under NEPA. Any further changes in the Mitigation Measures as part of the MOA would not change any EIR conclusion about project effects on architectural resources.

ARCHITECTURAL RESOURCES

5. Prior to any physical removal of buildings or site features, the Project Sponsor would prepare, or cause to be prepared, documentation of the Valencia Gardens complex. Such documentation would include the precise recording of the structures through measurements, drawings, and photographs and would meet the Historic American Buildings Survey (HABS) recordation standards. The HABS documentation would include the following:

- HABS outline report would be prepared and would include descriptive and historical information on the buildings, the architects, the landscaping, the landscape architect, the sculptures, and the artist. Information from the previous reports prepared, including the *Valencia Gardens Draft Historic Significance Evaluation*, Carey & Co., 1997, and the *Verification of Historic Significance, Valencia Gardens HOPE VI Project,* Carey & Co., 2002, would be used to fulfill some of the requirements for descriptive and historical information.

- Photographic documentation of the exterior of Valencia Gardens' neighborhood setting, buildings, courtyards, landscape and site features, and sculptures would be prepared.

- Photographic documentation of selected interiors, including a typical dwelling unit, would be prepared. The selected dwelling unit would be appropriately described in the outline report and keyed to the photographs.

- All photographic documentation would follow the HABS Photographic Standards for detail and quality, use of large format photographs and negatives, archival processing, labeling, and sacrificial test prints. Two sets of archival prints and one set of archival negatives would be prepared.

- Existing architect's drawings of the housing complex would be included in the HABS documentation. Reference would be made in the documentation report to the repository where the drawings are housed.

2. The documentation of Valencia Gardens would be submitted to the following repositories:

- Documentation report, ~~and~~ one set of photographs and negatives, and a copy of the original drawings (identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster") would be submitted to the History Room of the San Francisco Public Library.

- Documentation report would be submitted to the Northwest Information Center of the California Historical Resources Information Resource System.

- Documentation report, one set of photographs, original drawings, and rehabilitation drawings would be submitted to the Wurster, Bernardi & Emmons Collection, 1922-1974, Environmental Design Archives in the College of Environmental Design, University of California, Berkeley. The original drawings are identified in the Appendix II of Draft Historic Significance Evaluation of the Valencia Gardens as "Original Drawings for Valencia Gardens on 03-10-41 by Harry A. Thomsen Jr. and William Wilson Wurster." The rehabilitation drawings are identified as "Renovation Drawings for Kitchens and Bathrooms on 12-28-73 by the Housing Authority of the City and County of San Francisco." Both drawings sets are in the possession of the San Francisco Housing Authority and would be examined by a conservator prior to their donation.

  - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Planning Department for review prior to issuance of any permit that may be required by the City and County of San Francisco for demolition of Valencia Gardens.

  - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Landmarks Preservation Advisory Board.

3. The Project Sponsor would provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and~~/or~~ written histories documenting the lives of, and events associated with, past occupants of the Valencia Gardens Housing Project. The interpretive display would also include

information on why the existing Valencia Gardens housing is inappropriate for its current use as discussed in the HOPE VI application section on existing conditions, as well as published articles regarding the design goals of the HOPE VI program, and the design goals developed in the resident design workshops for Valencia Gardens, which together show how social thinking has changed regarding what is now considered appropriate public housing design. The interpretive display would be submitted to the San Francisco Landmarks Preservation Advisory Board for review and approval prior to ~~final installation~~ issuance of a final certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The LPAB may appoint a liaison to work with the Project Sponsor in directing the research on the interpretive materials.

4. The Project Sponsor, along with the President of the LPAB, would work with the San Francisco Arts Commission to incorporate the Bufano sculptures into the proposed site design. Subject to Arts Commission approval, the Bufano sculptures would be returned to the project site after construction. Prior to removing the sculptures from the site, an art conservator would inspect each sculpture to determine their existing condition. A qualified mover with experience in moving fine art pieces would be contracted to move the sculptures to a storage facility during construction of the proposed project. The storage facility would be one recommended by the art conservator. The same moving company would move the sculptures back, and the art conservator would supervise their placement on the project site. ~~their placement on the project site would be supervised by the art conservator.~~

APPENDIX A: INITIAL STUDY

PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street, Suite 500 San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

TO: **Interested Parties**

FROM: **Paul E. Maltzer, Environmental Review Officer**

DATE: **November 9, 2002**

RE: **Enclosed Notices -- Case No. 2002.0809E: Valencia Gardens Hope VI Public Housing Project**

Enclosed for your information and review are a Notice of Preparation of a Draft Environmental Impact Report (EIR) and a Notice that an Environmental Impact Report is Determined to be Required for the above-referenced project. These notices are required under state and local law and are being sent to you because you have expressed an interest in the proposed project or the project area, or because you have been identified by the Planning Department as potentially having an interest in the project. Notice of publication of these documents will also be printed in a newspaper of general circulation on Saturday, November 9. 2002.

An Initial Study has been prepared and provides further information regarding the proposed project and the environmental issues to be considered in the Draft EIR. This document is either attached or is available for review upon request from Rana Ahmadi at (415) 558-5966 or at the address above.

As stated in the Notices, the Planning Department has determined that an EIR must be prepared for the proposed project prior to any final decision regarding whether to approve the project. The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project, to identify possible ways to minimize the significant effects, and to describe and analyze possible alternatives to the proposed project. Please note that preparation of an EIR does not indicate a decision by the City to approve or to disapprove the proposed project. Prior to making any such decision, the decision makers must review and consider the information contained in the EIR.

An appeal, as stated on the attached notices, requires the Planning Commission to determine whether or not an EIR must be prepared, based upon whether or not the project could have a substantial adverse effect on the physical environment. If an appeal is filed, there will be public hearing at which anyone may testify for or against the contention that an EIR is required. In the absence of an appeal, the Planning Department will proceed with its decision to prepare an EIR.

If you have any questions concerning the attached materials or this process or would like to review the Initial Study, please contact Rana Ahmadi at the Planning Department.

PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street, Suite 500 San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

November 9, 2002

TO: Responsible, Trustee Agencies, and Interested Parties

FROM: Paul E. Maltzer, Environmental Review Officer

RE: Notice of Preparation of a Draft Environmental Impact Report

The City and County of San Francisco Planning Department is the Lead Agency and will prepare an Environmental Impact Report for the following project:

2002.0809E: Valencia Gardens Hope VI Public Housing Project – The proposed project would be the replacement construction of the Valencia Gardens Housing. The new construction would consist of 17 three-story buildings containing 247 residential units; a community center (approximately 4,000 sq. ft.); a childcare center (approximately 3,200 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project would require demolition of the existing Valencia Gardens buildings that includes 22 three-story residential buildings containing 246 residential units; community space, a computer learning center and property management facilities (together totaling approximately 4,600 sq. ft.); a childcare center (approximately 2,000 sq. ft.); community open space; and 82 surface parking spaces.

The proposed Valencia Gardens project site is located at 340-370 Valencia Street in the Mission District of San Francisco. The approximately 5-acre site occupies most of the City block and is on Lot 2 of Assessor's Block 3546. The project site is within a RM-1 (Residential, Mixed Districts, Low Density) Zoning district. The northernmost portion of the site is in the 50-X height and bulk district and the remainder of the site is within the 40-X height and bulk district. The project would require Conditional Use Authorization from the Planning Commission for Planned Unit Development.

The Notice of Preparation of a Draft Environmental Impact Report (EIR) and Notice that an EIR is Determined to be Required for the above-referenced project are being sent to you because you have expressed an interest in the proposed project, or because you have been identified by the Planning Department as potentially having an interest in the project. Notice of publication of these documents will be printed in a newspaper of general circulation on the day following the day that these notices were mailed to you. As stated in the enclosed Notices, the Planning Department has determined that pursuant to the California Environmental Quality Act (CEQA) an EIR must be prepared prior to any final decision regarding the project.

We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project.

Written comments on the scope of the EIR will be accepted until the close of business on December 10, 2002. Written comments should be sent to: Paul E. Maltzer, Environmental Review Officer, San Francisco Planning Department, 1660 Mission Street, Ste. 500, San Francisco, CA 94103. Please include the name of a contact person in your agency. Thank you.

Paul E. Maltzer
Environmental Review Officer

Date November 7, 2002

PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street, Suite 500 San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT (EIR) IS DETERMINED TO BE REQUIRED

Date of this Notice: November 9, 2002

Lead Agency: Planning Department, City and County of San Francisco
1660 Mission Street - 5th Floor, San Francisco, CA 94103-2414
Agency Contact Person: Rana Ahmadi **Telephone**: (415) 558-5966

Project Title: 2002.0809E: Valencia Gardens Hope VI Public Housing Project
Project Sponsor: Mission Housing Development Corporation (MHDC) and San Francisco Housing Authority
Project Contact Person: Lisa Pagan, MHDC 415-864-6432

Project Address: 340-370 Valencia Street **Assessor's Block(s) and Lot(s)**: 3546/2
City and County: San Francisco

Project Description: The proposed project would be the replacement construction of the Valencia Gardens Housing. The new construction would consist of 17 three-story buildings containing 247 residential units; a community center (approximately 4,000 sq. ft.); a childcare center (approximately 3,200 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project would require demolition of the existing Valencia Gardens buildings that includes 22 three-story residential buildings containing 246 residential units; community space, a computer learning center and property management facilities (together totaling approximately 4,600 sq. ft.); a childcare center (approximately 2,000 sq. ft.); community open space; and 82 surface parking spaces. The proposed Valencia Gardens project site is located at 340-370 Valencia Street in the Mission District of San Francisco. The approximately 5-acre site occupies most of the City block and is on Lot 2 of Assessor's Block 3546. The project site is within a RM-1 (Residential, Mixed Districts, Low Density) Zoning district. The northernmost portion of the site is in the 50-X height and bulk district and the remainder of the site is within the 40-X height and bulk district. The project would require Conditional Use Authorization from the Planning Commission for Planned Unit Development.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal to the Planning Commission of this Determination that an EIR is required:
December 10, 2002 at 5:00 p.m.

An appeal requires: 1) a letter specifying the grounds for the appeal; and
2) a $209.00 filing fee.

Paul E. Maltzer
Environmental Review Officer
Planning Department

The text of the Initial Study has been revised since publication. Additions to the text have been underlined and deletions have been ~~struck through~~.

VALENCIA GARDENS HOPE VI PROJECT
INITIAL STUDY
Case No. 2002.0809E

I. PROJECT DESCRIPTION

The proposed Valencia Gardens project site is located at 340-370 Valencia Street, between Guerrero and Valencia Streets, between 14th and 15th Streets, in the Mission District of San Francisco (see Figure 1). The approximately 5-acre site occupies most of the City block and is on Lot 2 of Assessor's Block 3546. The parcel is owned by the San Francisco Housing Authority. The project site is within a RM-1 (Residential, Mixed Districts, Low Density) Zoning district. The northernmost portion of the site is in the 50-X height and bulk district and the remainder of the site is within the 40-X height and bulk district. The site is predominantly flat and is bordered on the south by 15th Street, on the west by Guerrero Street, and on the east by Valencia Street. There are three- and four-story residential buildings to the north of the project site that front on 14th Street. Guerrero Street in the project vicinity is predominantly two- to four-story residential buildings, with commercial uses on the street level of corner buildings. Valencia Street in the project vicinity is predominantly three- to four story residential buildings with some street level commercial uses throughout the block as well as a few exclusively commercial buildings. Fifteenth Street in the project vicinity is predominantly two- to four-story residential buildings, with one- to two story commercial uses intermixed. The surrounding land uses are predominantly single-family and multi-unit residential, with some commercial storefronts at street level.

The existing Valencia Gardens Public Housing, which would be demolished and replaced under the proposed project, is comprised of 22 three-story residential buildings containing 246 residential units; community space, a computer learning center and property management facilities (together totaling approximately 4,600 sq. ft.); a childcare center (approximately 2,000 sq. ft.); community open space; and 82 surface parking spaces. The buildings are arranged in a continuous S-shaped configuration at the center of the parcel to create communal open space between and around the buildings. The open spaces are characterized by lawns, perimeter trees, and other landscape features. The open spaces include eight Works Progress Administration-era (a Depression-era federal employment program) sculptures created by well-known local sculptor Benieminio Bufano. The site is accessible from Valencia, Guerrero and 15th Streets, as well as from an alley at the north end of the site extending west from Valencia Street to Guerrero Street, mid-block between 15th and 14th Streets, where there are 82 surface parking spaces. Valencia Gardens was built in 1942 and designed by architect William Wurster, with landscaping designed by landscape architect Thomas Church, for the San Francisco Housing Authority (SFHA).

Mission Housing Development Corporation (MHDC) is working in partnership with the SFHA to redevelop the Valencia Gardens Public Housing development. The US Department of Housing and Urban Development (HUD) HOPE VI program, along with tax credit financing and other sources will be used to fund the project. The proposed project would include 17 three-story buildings containing 247 residential units; a community center (approximately 4,000 sq. ft.); a

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FIGURE 1: PROJECT LOCATION

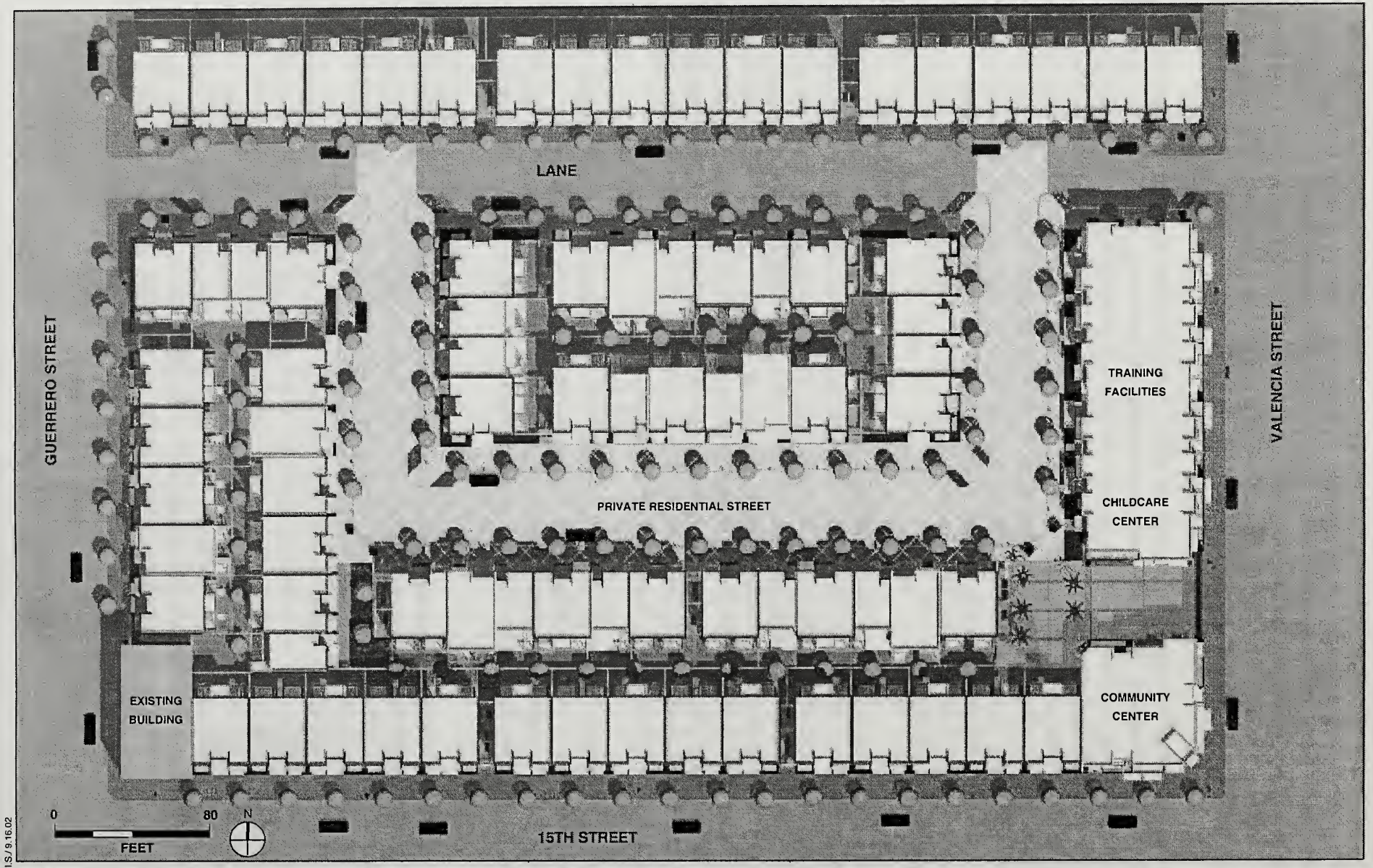
childcare center (approximately 3,200 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The new development would provide affordable housing opportunities and would improve public housing facilities, amenities, security, and ADA access at the site. The proposed project would require demolition of the existing 22 three-story buildings Valencia Gardens buildings.

The proposed project would be designed with an architectural character intended to reflect the scale and style of residential structures in the surrounding neighborhoods; they would be oriented as walk-up apartments in street-facing row houses, and include architectural details such as bay windows, varied rooflines and modulated massing. Maximum height of the proposed buildings would be 40 feet. New residential streets would be introduced to create residential blocks similar to those in the surrounding Mission District neighborhood (see Figures 2 and 3). The new U-shaped interior street would have parallel surface parking on both sides and would connect with the new east-west through street at two points; the new streets would be designed for local residential traffic. The new interior street would include special paving to denote the increased level of pedestrian activity.

Along Valencia Street, the ground floor would include community spaces, management offices, and childcare facilities, with residences above. The community center would be at the corner of Valencia and 15th Streets (see Figure 2). A secured "front door" would be oriented toward this intersection. A semi-public shared community plaza would be located behind the community center to provide a multi-function outdoor space for residents and their guests. The childcare center, which would front Valencia Street, would be located adjacent to the community center, opposite the dedicated childcare open space; this open space would connect to the community plaza. A business incubator space, intended for training facilities and other resident uses, would be adjacent to the childcare center fronting Valencia Street.

The proposed project would provide 20 one-bedroom, 130 two-bedroom, 85 three-bedroom, and 12 four-bedroom units. All units would have private exterior access from the sidewalk, with most units sharing a stoop or entry terrace with only one other unit. All of the units would face the public and private streets, with visible front doors and windows providing "eyes on the street."

During construction activities, Valencia Gardens residents would be temporarily relocated to existing housing sites within the San Francisco Bay Area. It is anticipated that the project would be constructed in a single phase requiring the relocation of all residents off site, but the feasibility of phased construction is being reviewed by the project applicant. The project may be constructed in two phases with approximately 75% of the site being demolished and reconstructed in Phase I and 25% of the site demolished in Phase II. If the project is phased, some residents would live on site during construction. Single-phased project construction would take about 24 months, including hazardous materials removal, demolition of the existing structures, site stabilization by compaction grouting to eliminate potential for liquefaction, grading, and utilities installation, with planned occupancy for August 2005. Should phased construction occur, the construction schedule would be extended an additional 12 to 18 months to complete Phase II between August 2006 and February 2007.



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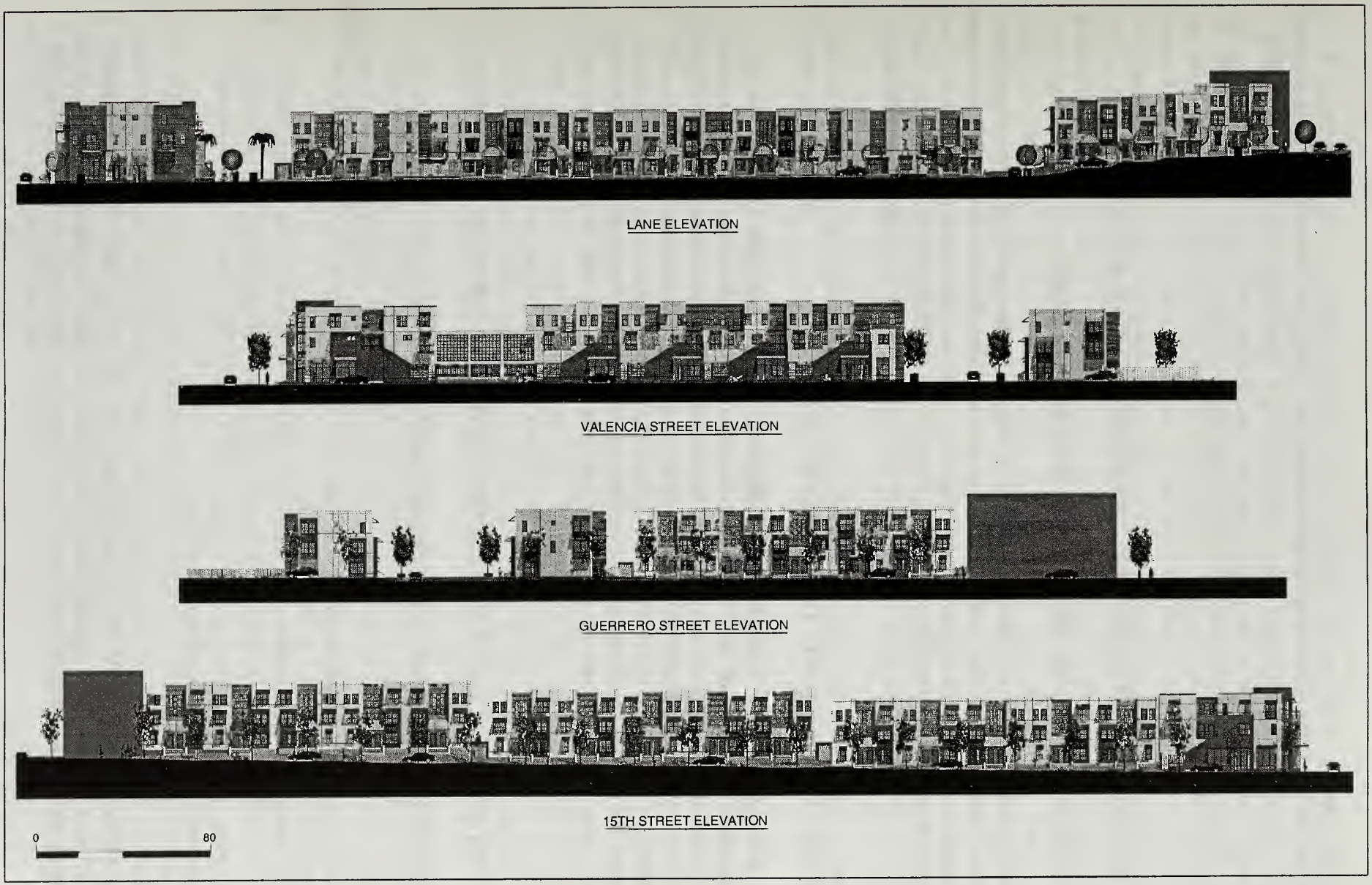
SOURCE: Van Meter Williams Pollack

VALENCIA GARDENS HOPE VI PROJECT

FIGURE 2: CONCEPTUAL SITE PLAN



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SOURCE: Van Meter Williams Pollack

VALENCIA GARDENS HOPE VI PROJECT

FIGURE 3: CONCEPTUAL STREET ELEVATIONS

The proposed project would require demolition and building permits from the Department of Building Inspection. The proposed project would require Conditional Use authorization from the Planning Commission for a Planned Unit Development and other discretionary reviews. Other approvals for various aspects of the project may be required from the Planning Commission, the Zoning Administrator, the Arts Commission, and the Board of Supervisors.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

This Initial Study examines the Valencia Gardens HOPE VI Project to identify potential effects on the environment. On the basis of this study, project-specific effects that have been determined to be potentially significant relate to historic resources. This issue will be analyzed in an Environmental Impact Report (EIR). Topics noted "TO BE DETERMINED" mean that discussion in the EIR will enable a determination whether or not there would be a significant impact.

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following effects of the Valencia Gardens HOPE VI Project have been determined to be either insignificant or to be mitigated through measures included in the project: land use; visual quality; population; transportation and parking; noise; air quality and climate; utilities and public services; biology; geology and topography; water; energy and natural resources; hazards; and cultural resources (archaeological resources). Those issues are discussed below and require no further environmental analysis in the EIR. All mitigation measures and improvement measures listed on pages 32-39 have been agreed to by the project sponsor and will be incorporated into the project.

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

		Not Applicable	Discussed
1.	Discuss any variances, special authorizations, changes proposed to the City Planning Code or Zoning Map, if applicable.	—	X
2.	Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.	X	—

The Valencia Gardens HOPE VI Project would require review by the Planning Commission in context of the *San Francisco General Plan* and other relevant plans. Applicable Area Plans and Elements of the *General Plan* include the Residence Element, the Urban Design Element, and

other elements. If the proposed project, on balance, were to have substantial conflicts with the *General Plan* objectives, it could not be approved.

The project site is within a RM-1 (Residential, Mixed Districts, Low Density) zoning district, and within the 40-X and 50-X Height and Bulk districts. The northernmost portion of the site is in the 40-X height and bulk district and the remainder of the site is within the 50-X district. The residential, childcare and community space uses of the proposed project are allowable by right. The proposed project's buildings, at three stories high, would be consistent with the 40-X and 50-X Height and Bulk Districts. The proposed project would require Conditional Use authorization from the Planning Commission to determine qualification as a Planned Unit Development (PUD) under Section 304 of the City Planning Code. A PUD allows for development of sites of considerable size (greater than one-half acre) as an integrated unit and permits well reasoned modifications of certain provisions of the Planning Code such as parking, open space, rear yard, and bulk standards. Exceptions to the provisions of the Planning Code shall be authorized by the Planning Commission through the Conditional Use Authorization for the PUD as per Section 304 of the Planning Code.

A chronology of recent zoning controls in the project vicinity relevant to the proposed project include the following:

On July 6, 2001, the Board of Supervisors passed Resolution No. 518-01 - Adopting Interim Controls regulating uses in the Mission District within a larger boundary (Guerrero Street, Cesar Chavez Street, Potrero Avenue, and the Central Freeway). For any change of use, the Resolution requires a mandatory discretionary review hearing by the Planning Commission and posting of a sign on the property in compliance with the requirements of Planning Code Section 306.8. The Resolution also requires conditional use authorization by the Planning Commission for all new market-rate housing projects or conversions of existing residential uses to market-rate housing. The project site is located within the Mission District Interim Control. However, since the project would not change the existing uses on the site, and would not provide market rate housing, no discressionary review or Conditional Use authorization would be required under the Mission District Interim Control.

On November 2, 2001, the Board of Supervisors passed Resolution No. 841-01 - Adopting Interim Controls with amendments for the Mission District, which is an extension of the above Resolution 518-01 with some minor changes and clarifications. These amendments would not change the controls as they relate to the proposed project.

At their regular meeting on July 15, 2002, the Board Supervisor passed resolution "Amending and Extending the Interim Controls in the Mission District" so that the Interim Controls will be in place until July 7, 2003.

It should be noted that community organizations and residents within the Mission District are presently working with the Planning Department on the Eastern Neighborhoods Community Planning Process, of which one of the goals is to develop a new set of zoning regulations for the broader Mission District, including the project site. The planning effort, which includes a series of workshops for broad community participation in developing the plan and zoning proposals, is targeted for completion by the end of 2002.

Although highly likely, at this time it is not known whether the project site or its vicinity will under go any change in zoning as a result of the community-based planning process; therefore, this Initial Study must evaluate the proposed project in terms of its relationship to the existing zoning controls and in terms of its potential impact on the existing environmental setting.

As part of their Better Neighborhoods Program, the San Francisco Planning Department is currently working with three neighborhoods to draft neighborhood plans. One of those neighborhoods, the Market and Octavia area, is directly to the north and west of the proposed project, but does not include the Valencia Gardens site. Generally, the Market and Octavia Neighborhood Plan supports transit-oriented mixed-use developments, infill development, new housing, affordable housing, and reduced parking requirements.

Environmental plans and policies are those, like the Bay Area Air Quality Plan, which directly address environmental issues and/or contain targets or standards which must be met in order to preserve or improve characteristics of the City's physical environment. The current proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The City's General Plan, which provides general policies and objectives to guide land use decisions, contains some policies which relate to physical environmental issues. The current proposed project would not obviously or substantially conflict with the General Plan. In general, potential conflicts with the General Plan are considered by decision makers independently of the environmental review process, as part of the decision whether to approve or disapprove a proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies.

B. ENVIRONMENTAL EFFECTS

The proposed project has been evaluated to determine whether it would result in significant environmental impacts. All items except Architectural Resources in the following Initial Study Environmental Evaluation Checklist have been checked "No," indicating that Planning Department staff have determined that the proposed project could not have a significant adverse effect on the environment. Several of the checklist items have been checked "Discussed,"

indicating that the Initial Study text includes discussion about those particular issues. For all of the items checked "No," without a discussion, the conclusions regarding potential significant adverse environmental effects are based on field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's *Transportation Guidelines for Environmental Review*. For each checked item, staff considered both the individual and cumulative impacts of the proposed project.

1. **Land Use. Could the project:**	Yes	No	Discussed
a. Disrupt or divide the physical arrangement of an established community?	__	X	X
b. Have any substantial impact upon the existing character of the vicinity?	__	X	X

As noted in the project description, the approximately five-acre site includes most of the City block bounded by Valencia, 15th, Guerrero, and 14th Streets. The block is near the commercial corridor of Mission Street and the 16th Street BART station, located one block to the south and east. The Valencia Gardens Public Housing development occupies the southern portion of the block, with the exception of the corner parcel at the corner of 15th and Guerrero Streets, which is occupied by a ground-floor retail use with multi unit residential above. Two- and three-story residential buildings with some commercial uses surround the site.

The proposed project would replace 22 three-story buildings (approximately 175,300 gsf) containing 246 residential units and 82 surface parking spaces with 17 three-story buildings (approximately 259,100 gsf) including 247 residential units; a community center (approximately 4,000 sq. ft.); a childcare center (approximately 3,200 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space; and 86 surface parking spaces. The proposed project would result in a net increase of one residential unit, to be used as a residence for an on-site property manager, and a net increase of four surface parking spaces. The three-story buildings of the proposed project would be generally consistent with the density, height and scale of surrounding residential uses. Overall, the proposed project's residential and other uses would be consistent with existing residential and retail land uses in the vicinity and would not have a substantial adverse effect on land use, nor would it disrupt or divide the physical arrangement of an established community. The EIR will, therefore, not discuss land use.

2. **Visual Quality. Could the project:**	Yes	No	Discussed
a. Have a substantial, demonstrable negative aesthetic effect?	__	X	X
b. Substantially degrade or obstruct any scenic view or vista now observed from public areas?	__	X	X
c. Generate obtrusive light or glare substantially impacting other properties?	__	X	X

The proposed project would include construction of 17 three-story buildings with a height ranging from 32 to 40 feet. The proposed project would include demolition of 22 existing buildings, ranging from approximately 30 to 35 feet in height. The new Valencia Gardens buildings would be somewhat taller than the existing three-story buildings on the site, and about the same height as the residential buildings, ranging from two to three stories or about 20 to 40 feet tall, surrounding the site. The proposed buildings would incorporate materials, window patterns and styles, colors, textures, roof forms, and a vertical emphasis that are present in the neighboring residential buildings with the intention of being compatible with the residential character of the surrounding neighborhood.

The proposed buildings would alter the existing density of development, occupying the central portion of the project site with open space around the perimeter of the site, to residential and community uses built out to the street wall on all four sides of the site. This pattern would be similar to existing residential and commercial development on Valencia, 15th, Guerrero, and 14th Streets. It should be noted that although the building layouts would be different compared to the existing buildings, the proposed project would be similar in height.

The proposed buildings would be visible from nearby locations on Valencia, 15th, Guerrero, and 14th Streets and would replace views of the existing Valencia Gardens buildings. Views of the buildings would be limited from other nearby viewpoints as they would be blocked by other existing buildings. The proposed project would be partially visible from longer-range viewpoints such as Twin Peaks, as part of overall views of the Mission District. Views of the proposed project from Mission Dolores Park would be blocked by existing buildings.

The proposed project would not degrade scenic views of the San Francisco Bay or other public areas, and would not have a substantial, demonstrable negative aesthetic effect.

Additional light would be introduced by the increased street front density of the proposed project but would not significantly affect surrounding properties. New lighting would include fixtures at the building entrances and other locations for safety and security, typical of residential development. The project would comply with City Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Therefore, mirrored glass would not be used, and the building would not result in glare affecting other properties. The EIR will, therefore, not discuss light and glare.

3. **Population. Could the project:**	Yes	No	Discussed
a. Induce substantial growth or concentration of population?	__	X	X
b. Displace a large number of people (involving either housing or employment)?	__	X	X
c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	__	X	X

The proposed project includes the construction of 17 new three-story buildings including 247 residential units (approximately 245,700 sq. ft.); a new childcare center for 30 children

(approximately 3,200 sq. ft.); a new community center (approximately 4,000 sq. ft.); a computer learning center (approximately 4,000 sq. ft.); an outdoor child play space (approximately 2,200 sq. ft.) and other semi-public community open space. It would demolish 22 three-story buildings containing 246 residential units (approximately 175,300 sq. ft.); a childcare center for approximately 30 children (approximately 2,000 sq. ft.); and community space, a computer learning center and property management facilities (together totaling approximately 4,600 sq. ft.). The proposed project would result in a net increase of one residential unit; approximately 1,200 sq. ft. of childcare space; and approximately 3,400 sq. ft. of property management, community center, and training facilities on the site. Table 1 outlines the existing and proposed uses on the site and the associated populations.

Table 1
Existing and Proposed Site Population

	Existing		**Proposed**		
Residential Use	No. Units[1]	Population	No. Units	Population/ unit[3]	Popula-tion
1 bedroom unit	114	NA	20	2	40
2 bedroom unit	102	NA	130	4	520
3 bedroom unit	30	NA	85	6	510
4 bedroom unit	0	NA	12	8	96
Residential Total	*246*	*599*[2]	*247*		*1,166*
Non-Residential Use	Employees[1]		Employees[1]		
Management, Community Center, Computer Learning/ Training Center	10 (4,600 sq ft)		11 (8,000 sq ft)		
Childcare Center	3 workers 22 children (11 non-residents)[4]		5 workers 30 children (15 non-residents)[4]		
Non-Residential Total	*24*		*31*		
TOTAL	**623**		**1,197**		

1. Source: MHDC
2. The residential total is from the 1997 SFHA Public Housing Operation Department rent roll, before the relocation of residents began. The rent roll provides the total number of occupied units (243) and the total population for the site (599). Door-to-door survey of population per unit at Valencia Gardens have previously been conducted and have indicated a higher number of residents per unit and issues of overcrowding. Using the rent roll statistic for the analysis in this document, is the conservative approach. The increase in population on the site is what is analyzed, and a lower existing population provides for a greater increase in population.
3. The SFHA has admissions and continued occupancy policies, based on HUD criteria, which outline a range of population per number of bedrooms and relate to the number of adults, number of children, and gender of children in a unit. For the purpose of this analysis the highest number in the range was used.
4. Approximately 50% of the children in the childcare center would be non-residents.

The development of 247 affordable housing units would result in an onsite population of up to about 1,197 people. The increase in population at the site, a total of about 574 people, including about 567 residents, about 4 non-resident day-care children, and about 3 employees is not due to a great increase in units or uses, but the change in the types of units provided. The existing Valencia Gardens has primarily one and two bedroom units while the proposed project has primarily two and three bedroom units. The increase of population on the site would not be significant relative to the amount of residents and employees within the project vicinity; nor would it be significant with regard to expected increases in the population and employment of San Francisco. No significant physical environmental effects on housing demand or population would occur, and these issues require no further analysis in the EIR.

The project would temporarily displace 246 units of existing public housing. The Valencia Gardens Relocation Plan was submitted to and approved by HUD in 2000. To date, approximately 160 of 246 Valencia Gardens units, or approximately 65% of the units, have been vacated as part of the Valencia Gardens Relocation Plan. Approximately 480 residents of a total of about 630[1] residents, or approximately 76%, have been relocated to other housing in the San Francisco Bay Area. All eligible Valencia Gardens residents would be offered an opportunity to return to Valencia Gardens after construction. If a two-phase construction plan were pursued, some residents may continue to occupy apartments during the demolition and reconstruction of Phase I of the proposed project, which would include demolition and reconstruction of 75% of the site, with the remaining 25% to be demolished and reconstructed as part of Phase II of the project. Based on the above analysis, no significant physical environmental effects on housing demand or population would occur, and these issues require no further analysis in the EIR.

4. Transportation. Could the project:	Yes	No	Discussed
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	__	X	X
b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	__	X	__
c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	__	X	__
d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	__	X	__

A transportation memorandum initiated and directed by the project sponsor was prepared for the proposed Valencia Gardens Hope VI project and is available for public review at the Planning Department.[2] The following is a summary of the transportation memorandum.

Existing Conditions

Traffic

Regional Access - The regional access to the project area is provided by Interstate 80 (I-80) and U.S. Highway 101 (US 101). The closest access point to US 101 and the Bay Bridge I-80 from the project site is via the Central Freeway on-ramp at South Van Ness Avenue/13th Street, approximately four blocks east of the project. The closest off-ramp from US 101 and the Bay Bridge I-80 is located at Mission Street/Duboce Street, approximately four blocks to the north-east of the proposed project.

Local Street Network - The proposed project is served by a comprehensive street network; the streets adjacent to the proposed project, as well as Mission Street, are as follows:

14th Street. In the vicinity of the proposed project, 14th Street is a one-way east bound roadway with two travel lanes and a Class II bike lane. On-street metered parking is provided on both sides of the street east of Valencia Street. West of Valencia Street there is unmetered residential permit parking on both sides of the street.

15th Street. In the vicinity of the proposed project, 15th Street is a one-way westbound roadway with two travel lanes and on-street parking on both sides of the street. The on-street parking east of Valencia Street is metered. The on-street parking west of Valencia Street is unmetered residential permit parking.

Valencia Street. In the vicinity of the proposed project, Valencia Street is a two-way north-south running roadway with one through lane in each direction and a two-way left turn lane in the median of the street. Vehicles were observed using the two-way left turn lane for parking. There is a Class II bike lane in both directions of the street. On-street metered parking exists on both sides of the street.

Guerrero Street. In the vicinity of the proposed project, Guerrero Street is a two-way north-south running roadway with two travel lanes in each direction and a raised center median in the middle of the street. There is undeterred residential permit parking on both sides of the street. Left turns are prohibited along Guerrero Street in both directions at 15th Street and in the northbound direction at 14th Street.

Mission Street. One block east of the project site, Mission Street is a two-way north-south running arterial roadway with two travel lanes in each direction. On-street metered parking is provided on both sides of the street, except on the west side of the street between Duboce and 14th Street, where unmetered, one-hour time parking is provided. Mission Street is a major transit corridor which the San Francisco General Plan has designated as a Transit Preferential Street.

Transit

There are seven MUNI bus lines serving the proposed project vicinity (14-Mission, 14L-Mission Limited, 22-Fillmore, 26-Valencia, 33-Stanyon, 49-Van Ness, and 53-Southern Heights). The PM peak period frequency and closest stop location of each line are listed in the Table 2.

Table 2
Transit Headways and Stop Locations

Line	PM Peak Period Frequency	Nearest Stop Location
14-Mission	5 minutes	Mission at 15th Street
14L-Mission Limited	No PM peak service	Mission at 16th Street
22-Fillmore	6 minutes	16th Street at Mission
26-Valencia	15 minutes	Valencia at 15th Street
33-Stanyon	15 minutes	16th Street at Mission
49-Van Ness	7 minutes	S. Van Ness at 15th Street
53-Southern Heights	30 minutes	15th Street at Valencia

Source: CHS Consulting Group, based on 2002 MUNI Transit Map

Regional transit service to and from the Peninsula is provided by SamTrans buses on Van Ness Avenue two blocks east of the proposed project. Regional transit access to and from the East Bay and Daly City and Colma is provided by BART at the 16th Street Station, located two blocks from the proposed project. Other regional transit services, such as Caltrain, AC Transit and Golden Gate Transit, are available further away from the proposed project and would have to be accessed through a connecting MUNI line.

On-Street Parking

A recent study for a development one block east of the proposed project (1886 Mission Street Residential Street Building Transportation Report, ESA 2001) reports that within the area bounded by 16th Street, Guerrero Street, Market Street, McCoppin and Otis Streets, and South Van Ness Avenue there are approximately 1,495 on-street parking spaces. Of these, 390 are unmetered residential permit parking spaces. The study indicates that 91 percent of these on-street parking spaces were occupied during the midday peak period (1:30 to 3:00 PM). While no new on-street parking counts were conducted for this study, qualitative observations were made during the PM peak period (4:00 to 6:00 PM) and the late evening period (after 6:00 PM) on Thursday, October 17, 2002 which confirmed the high occupancy rates on most area streets cited in the 1886 Mission Street study. It should be noted that occupancy rates during the evening period approach 100 percent (or more when illegal parking is taken into consideration) on many streets as area residents return home after work.

Off-Street Parking

Field surveys conducted for the 1886 Mission Street study indicate that there are two off-street parking facilities within a two block radius of the proposed project with about 275 spaces total.

The spaces were reported to experience an occupancy rate of approximately 93 percent during the midday peak period. New off-street counts were not conducted.

Bicycle Conditions

The Official San Francisco Bike Route System lists three bicycle routes in the vicinity of the proposed project.

Route 30 - Route 30 connects Downtown with Golden Gate Park. Near the proposed project, this route runs along 14th Street. There is a Class II bike line in each direction of the street.

Route 45 - Route 45 connects the Marina with Daly City. Near the proposed project, this route runs along Valencia Street. There is a Class II bike lane in both directions of the street.

Route 50 - Route 50 connects Downtown with the southern Sunset District. Near the proposed project this route runs along Market Street two blocks to the north of the project site. This route has a dedicated lane between McCoppin and 17th Streets.

Pedestrian Conditions

Pedestrian amenities near the proposed project include 10-12 foot wide sidewalks and crosswalks at all the intersections immediately adjacent to the project site (14th Street/Valencia Street, 15th Street/Valencia Street, 14th Street/ Guerrero Street 15th Street/Guerrero Street). Field observations indicated that pedestrian volumes on the sidewalks immediately adjacent to the proposed project are relatively light and pedestrian flow is generally free flow with room to pass. Conditions at the intersections are also free flow. However, pedestrians crossing the street at the intersection of 15th Street/ Valencia Street in the eastbound direction may have some difficulty due to the flashing yellow phase for both right and left turning vehicles at the eastbound approach. Because there is no separate pedestrian phase, cars making turns and pedestrians crossing on the flashing yellow conflict with each other.

Project Impact

Trip Generation

The proposed project would only add one residential unit beyond the existing number of units. However, a greater number of 2 plus bedroom units are proposed, and as a result the proposed project would generate more trips compared to the existing buildings. The proposed project would include an additional 1,200 sq. ft. of childcare, which would generate slightly more trips than the existing childcare facility. Separate trip generation calculations for the community center facility and the computer center (an addition of 3,4000 sq. ft.) were not conducted as those uses would predominantly serve the residents of the proposed project.

The proposed project would generate 325 daily person trips and 58 PM peak hour person trips above the full occupancy of the existing buildings. The proposed project would generate 19 new PM vehicle trips. Detailed trip calculations and information is available in the memorandum prepared by CHS Consulting Group, October 30, 2002, on file at the Planning Department.

Traffic

An intersection level of service (LOS) analysis was not conducted for this study. However, the 1886 Mission Street study indicates that intersection of 15th Street/Valencia Street operates at LOS D and 14th Street/Valencia Street operates at LOS C. Field observations made during the PM peak period confirmed that traffic at these two intersections does not experience significant delays and that overall, the two intersections operate at acceptable condition. Observations also indicated that the traffic volumes at the two other intersections adjacent to the project site (15th Street/Guerrero Street and 14th Street/Guerrero Street) are similar and would operate at similarly acceptable LOS as 15th Street/Valencia Street and 14th Street/Valencia Street. Field observations showed that at the intersection of 15th Street/Guerrero Street, traffic was generally free flow with only short queues forming in the east and northbound approaches. These queues typically cleared during the respective green phase for each approach. The intersection of 14th Street/Guerrero Street was observed operating without significant delays and with queues clearing during the respective green phases. It is anticipated that the 19 additional PM peak hour vehicle trips would be spread out over area roadways and intersections and would not result in significant traffic impacts at these intersections.

Transit

The proposed project would generate approximately 23 transit trips (inbound and outbound) during the PM peak hour. These transit trips would be spread out over the 6 MUNI lines as well as MUNI metro lines, SamTrans, and BART in the inbound and outbound directions and therefore there would not likely be any significant impacts to transit service.

Parking

There are currently 82 off-street parking spaces for the 246 Valencia Gardens residential units. The proposed project would include 86 off-street parking spaces for 247 residential units.

Code Required Parking

The proposed project is located in a RM-1 zoning district, which requires residential developments to provide one space per residential unit. If parking requirements are calculated at this rate, the proposed project would be required to provide 247 parking spaces for the residential use. However, the proposed project is a PUD, which is required to provide parking based on demand. As discussed in the following section, the proposed project generates a parking demand of 224 spaces, an increase in parking demand by approximately 47 spaces.

Project Generated Parking Demand

Parking demand calculations for both the existing and proposed uses are based on the rates provided in Parking Demand for Affordable Housing in San Francisco published by the San Francisco Planning Department. The proposed project would generate a parking demand for approximately 224 spaces, 217 for the residential use and 7 for the child care center. All of this demand is assumed to be long term demand. The child care center is small and its demand is

expected to be predominantly for employee parking rather than for visitors. This is an increase in demand of approximately 47 spaces over the existing parking demand of 177 spaces.

As shown in Table 3, the proposed project would provide 86 spaces, four more than under existing conditions, for the residential use. There would thus be a shortfall of 138 spaces (224 demand - 86 supply). Compared to the existing shortfall of approximately 95 spaces (177 demand - 82 supply), the net increase in the area's parking shortage would be 43 spaces (138 new shortfall - 95 existing shortfall). These 43 parking spaces would need to be found in on-street parking in the area. It should be noted that the actual parking demand and shortfall at the site could be less than calculated using the City's rates because vehicle ownership data from the project sponsor indicate a relatively low ownership rate (38 percent, based on 76 cars out of 201 occupied units) at Valencia Gardens. The proposed project is a PUD, which is required to provide parking based on demand. As the proposed project would not meet the parking demand, the project sponsor would require authorization from the Planning Commission for an exception under the PUD as per Section 304 of the Planning Code.

Table 3
Net Increase in Parking Shorfall with Proposed Project

	Supply	Demand	Shortfall
Proposed Project	86	224	138
Existing	82	177	95
Net Change	**4**	**47**	**43**

Source: CHS Consulting Group, 2002.

Under California Public Resources Code Section 21060.5, "environment" means "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance." Parking supply is not considered to be a part of the permanent physical environment in San Francisco. Parking conditions are not a static condition, as parking supply/demand varies from day to night, from day to day, month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. Therefore, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA.

Parking deficits may be associated with secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality, or noise effects caused by congestion. However, as noted above, in the experience of San Francisco transportation planners, the absence of a ready supply of parking spaces combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense patterns of urban development, may induce drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit first" policy.

Additionally, regarding potential secondary effects, cars circling and looking for a parking space in areas of limited parking supply is typically a temporary condition, often offset by a reduction

in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impact which may result from a shortfall in parking in the vicinity of the proposed project would likely be minor and difficult to predict.

Thus, a parking shortage is not considered to be a permanent conditions and is also not considered to be a physical environmental impact even though it is understood to be an inconvenience to drivers. Therefore, the creation of or an increase in parking demand resulting from a proposed project that cannot be met by existing or proposed parking facilities would not itself be considered a significant environmental effect under CEQA. In the absence of such physical environmental impacts, CEQA does not require environmental documents to propose mitigation measures solely because a project is expected to generate parking shortfalls.

Loading Impacts

Loading Demand Versus Supply

Based on the methodology presented in the *SF Guidelines*, the proposed project would generate approximately eight daily truck trips a day, seven for the residential use and less than one for the childcare facility. These eight daily truck trips equal an average and a peak demand of less than one loading space for both uses combined.

The proposed project would not provide any off-street loading spaces. Loading trucks destined to the site, however few, would have to park on street and hand truck their goods to the respective destinations. Large trucks, such as those used for move-ins, would also either park on-street or in the private street within the development. The internal private street would be 40 feet wide from curb to curb with parallel parking on both sides of the street. The width for travel would be approximately 24 feet, or one 12 foot travel lane in each direction. If a truck were double parked in one of the lanes, other cars would have to by pass the truck by crossing into the opposing direction of traffic. While loading impacts are not considered to be significant, Improvement Measure1 on page 39 would be incorporated into the project to minimize non-significant impacts.

Loading Requirements Versus Supply

Based on the Planning Code, the proposed project would be required to provide two off-street loading spaces, both for the residential use. The proposed project would not provide any off-street loading spaces and would not meet the code requirement. The project sponsor would require an authorization from the Planning Commission for an exception to the loading requirement under the PUD as per Section 304.

Passenger Loading Impacts

The proposed childcare center would likely generate demand for passenger loading spaces. Approximately 50% of the children in the childcare center would be residents of Valencia Gardens and would walk to the childcare center, and the other 50% would come from the surrounding neighborhoods and would walk, be driven or take mass transit to the center. As such, the actual number of spaces demanded for passenger loading is difficult to estimate. The main entrance to the childcare center would be on Valencia Street so passenger drop offs would

generally occur on Valencia Street in front of the proposed project. Currently, there is metered parking on the street in front of the proposed project. These spaces are generally full. To accommodate passenger loading, the project sponsor would apply to the Department of Parking and Traffic (DPT) to designate up to two on-street spaces as a passenger loading zone during the morning and afternoon peak drop-off and pick-up periods.

Pedestrian

The proposed project would generate approximately 29 pedestrian trips (23 transit and 6 walking) during the PM peak period. Pedestrian volumes are currently light and free flowing along sidewalks and at crosswalks adjacent to the project site. The additional pedestrian trips would not result in a significant impact on existing conditions.

Bicycle

The proposed project would not likely generate a significant number of bike trips. Based on the existing bicycle lane conditions and the project generated bicycle trips, the project is not expected to result in a noticeable impact on bicycle conditions in the area.

Future Cumulative Traffic Impacts

As concluded in the 1886 Mission Street study, under future cumulative conditions, 15th Street/Valencia Street and 14th Street/Valencia Street would operate at LOS F. The deterioration in LOS would be due primarily to background growth in traffic (assumed to be 1 percent per year) and other projects in the vicinity of the proposed project. If all of the approximately 19 net new trips run through each of the two intersections, the proposed project's contribution to traffic growth would be approximately 5 percent. However, the 19 trips would likely be spread out over several intersections, so fewer than 19 trips would be added at each of these intersections and thus the proposed project's contribution would not be considerable.

The 1886 Mission Street study did not address the cumulative traffic impacts at 15th Street/Guerrero Street and 14th Street/Guerrero Street; however, the traffic study for this project notes that these two intersections currently operate at similar conditions as the 14th Street/ Valencia Street and 15th Street/Valencia Street. Under future cumulative conditions, even if the two intersections on Guerrero Street would continue to operate at similar conditions as the two on Valencia Street (i.e., at LOS F), the proposed project's contribution to the growth in traffic at these two intersections would not be considerable (19 vehicles or less). Thus the proposed project would not have a significant impact on future cumulative traffic conditions.

Construction Period Impacts

The proposed project involves the demolition of existing residential and community uses and the construction of new residential and community uses. Demolition and construction activities are

expected to take place spanning approximately 24 months.[3] Following is the anticipated construction activity schedule:

- Months 1- 8: demolition and excavation
- Months 9-20: foundation construction and framing
- Months 16-24: interior installation

The largest number of trucks per day (30-60) at the site would be during demolition in the first two months, and approximately the largest number of workers at the site would be during the interior installation in the last nine months. Construction equipment and materials would be stored on-site as well as on the sidewalk of 15th Street. The sidewalk on 15th Street for the length of the project would be required for construction use during the entire construction period. Construction workers would need to find parking in nearby streets or the project sponsor would have to arrange for off-street parking arrangements in the area. The contractor should consider constructing a covered walkway along the occupied stretch of the sidewalk for pedestrians to pass or set up signs that direct pedestrians to alternative routes. While construction impacts are not considered to be significant because they would be temporary and of short-term duration, improvement measures have been incorporated into the project as Improvement Measures 2 and 3 (page 39) to minimize non-significant impacts of construction traffic. To the extent possible, construction truck movements would be limited to off-peak hours and the project sponsor and construction contractor would meet with the Traffic Engineering Division of the Department of Parking and Traffic and the Fire Department to determine feasible traffic mitigation to reduce traffic congestion and pedestrian circulation impacts during construction.

Based on the above, the EIR will not discuss transportation effects of the proposed project further.

5. Noise. Could the project:	Yes	No	Discussed
a. Increase substantially the ambient noise levels for adjoining areas?	__	X	X
b. Violate Title 24 Noise Insulation Standards, if applicable?	__	X	X
c. Be substantially impacted by existing noise levels?	__	X	__

Outdoor noise in the vicinity of the proposed project area includes numerous potential sources of noise. The most significant existing source of noise throughout most of San Francisco is traffic. This would be true in the proposed project area because of the proximity of Valencia Street and Guerrero Street, and the Muni Metro line on Valencia Street. The nearest sensitive receptors to the proposed project area would be the residential uses surrounding the project site.

Effects on Ambient Noise Levels

Construction Noise and Vibration. Construction activities for the proposed project would include demolition of the existing structures, excavation and hauling, erection and finishing of the new buildings. No pile driving would be necessary for construction of this proposed project.

The construction activities would be temporary and intermittent and would occur at different times through the phases of project construction. The construction period is anticipated to be about 24 months. Demolition, removal of the existing buildings, and site excavation would take about eight months. Foundation construction, wood frame, roofing, and interior and exterior finishing would take about 15 months. Demolition and other construction activities would be likely to cause temporary, substantial increases in noise but would be expected to occur for a duration of less than six months for the entire proposed project.

All demolition and construction activities would be conducted in compliance with the San Francisco Noise Ordinance (Article 29, San Francisco Police Code). The ordinance requires that noise levels from individual pieces of construction equipment other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. The project would include Mitigation Measure 1 on page 32 to further reduce construction noise. Section 2908 of the Noise Ordinance prohibits construction work between 8:00 PM and 7:00 AM, if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Project demolition and construction would comply with the Noise Ordinance. Compliance with the Noise Ordinance is required by law and would reduce any impacts on the environment to a less-than-significant level.

Based on the above analysis, no further analysis of construction noise or vibration will be presented in the EIR.

Traffic Noise. Ambient noise levels in the vicinity of the proposed project are typical of noise levels in urban San Francisco. The ambient noise is dominated by vehicular traffic, including trucks, cars, buses, Muni Metro streetcars, and emergency vehicles. Generally, traffic must double on adjacent streets in order to produce a noticeable increase in noise levels. Traffic volumes would not be expected to double as a result of the proposed project; therefore, substantial increases in traffic noise levels would not be anticipated in the project area. Traffic noise impacts would not have a significant impact on the environment and will not be analyzed further in the EIR.

Building Equipment Noise. The proposed project could include mechanical equipment, such as air conditioning units, which could produce operational noise. This equipment would be subject to and would have to comply with Section 2909 of the San Francisco Noise Ordinance which limits noise from building operations. Because substantial increases in the ambient noise level due to building equipment noise would not be anticipated, no significant impact on the environment would occur, thus the EIR will not discuss equipment noise further.

Interior Noise and Existing Noise Levels

Residential and childcare uses within an interior courtyard would be included with the proposed development. The noise insulation requirements of Title 24 of the California Code of Regulations apply to residential occupancies and thus would apply to the residential uses within the proposed project. Adherence to the standards of Title 24 would insulate the interior uses from excessive exterior noise levels. The childcare uses would be insulated from exterior noise

with normal interior design. Likewise, the proposed development's interior courtyard would be enclosed by the project buildings on three sides and predominantly shielded from the exterior noise environment. As such, interior noise and the effect of existing noise levels on the proposed development would not have a significant impact on the environment and will not be analyzed further in the EIR.

6. Air Quality / Climate. Could the project:	Yes	No	Discussed
a. Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	—	X	X
b. Expose sensitive receptors to substantial pollutant concentrations?	—	X	—
c. Permeate its vicinity with objectionable odors?	—	X	—
d. Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	—	X	X

Air Quality

Construction Emissions. During construction, air quality could potentially be affected for a short period. Heavy equipment could create fugitive dust and emit nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO_2), hydrocarbons (HC), and particulate matter with a diameter of less than 10 microns (PM_{10}) as a result of diesel fuel combustion. The primary pollutant of concern in fugitive dust would be PM_{10}.

Construction emissions would be short term and temporary, but could still cause adverse effects on local air quality. Bay Area Air Quality Management District (BAAQMD), in its CEQA Guidelines, has developed an analytical approach that obviates the need to quantitatively estimate these emissions. Instead, BAAQMD has identified a set of feasible PM_{10} control measures for construction activities. The project includes Mitigation Measures 2a and 2b (see page 32) to reduce the effects of construction activities to an insignificant level. Because the project would include these mitigation measures, it would not cause significant construction-related air quality effects. Therefore, the EIR will not address these effects further.

Emissions from Traffic and Equipment Operations. Potential air quality impacts from the proposed project could occur due to increased traffic throughout the region. The BAAQMD CEQA Guidelines indicate that residential projects of multiple-family housing would have potentially significant emissions if the proposed project includes more than 530 units of multi-family housing or generates more than 2,000 vehicle trips per day.[4] The proposed project would contain 247 housing units and approximately 3,200 square feet of childcare use. These uses would not be expected to generate more than 1,090 vehicle trips per day.[5] Because the size of the proposed project is below the screening thresholds in the guidelines, no potentially significant air quality impact is expected.

Shadow Effects

Section 295 of the City Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. Planning Code Section 295(a)(3) states that buildings permits for structures that will cast shade or shadow upon properties under the jurisdiction of the Recreation and Park Commission may not be issued with the exception of "[s]tructures to be constructed on property under the jurisdiction of the Recreation and Park Commission for recreational and park-related purposes." The proposed project buildings would be equal to or less than 40 feet in height, would not be subject to Section 295, and would not cause shading beyond what is common and accepted in urban areas. No significant shadow impact would occur, and this topic will not be analyzed further in the EIR.

Wind Effects

In order to provide a comfortable wind environment for people in San Francisco, the City established specific comfort criteria to be used in the evaluation of proposed buildings in certain areas of the City. The proposed project is not located in one of these areas, nor would the project buildings extend above their surroundings so that substantial wind effects would occur. The proposed project would maintain the approximate overall location and massing of the existing structures on the site and would not substantially change wind conditions or create discomfort for pedestrians and people in nearby seating areas. The proposed project would range up to 40 feet in height; typically, buildings of 100 feet in height or less would not create adverse pedestrian wind conditions. No significant wind impacts would occur, and the EIR will not discuss this issue further.

7. Utilities / Public Services. Could the project:	Yes	No	Discussed
a. Breach published national, state or local standards relating to solid waste or litter control?	__	X	X
b. Extend a sewer trunk line with capacity to serve new development?	__	X	X
c. Substantially increase demand for schools, recreation or other public facilities?	__	X	X
d. Require major expansion of power, water, or communications facilities?	__	X	X

The project would replace existing residential uses with similar uses, although at a slightly greater intensity. The project would not be expected to substantially increase the number of residents and employees on the site. As such, the project would not substantially change the demand for schools, recreation or other public facilities. The project would not substantially

increase existing solid waste, water demand, or wastewater at the project site. Therefore, the EIR will not discuss these issues further.

The project site presently receives police and fire protection services, and the project would create little additional demand for fire and police services in the area. Although the project could increase the number of calls received from the area or the level of regulatory oversight that must be provided as a result of the minor increase in concentration of activity on-site, the increase in responsibilities would not likely be substantial in light of the existing demand for police and fire protection services. Furthermore, the increase in demand would not require the construction of any new police of fire prevention facilities. For these reasons, the EIR will not discuss further police or fire protection services.

The project site is already served by power utilities and communication facilities. Although utilities would be replaced throughout the site, the new buildings would tap into the existing power and communications grids. Therefore, no new power or communications facilities would be necessary as a result of project implementation, and the EIR will not discuss this issue further.

8. Biology. Could the project:	Yes	No	Discussed
a. Substantially affect a rare or endangered species of animal or plant, or the habitat of the species?	__	X	X
b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	__	X	X
c. Require removal of substantial numbers of mature, scenic trees?	__	X	X

No known rare, threatened or endangered species are known to exist on the project site. The proposed project site is in a heavily developed urban area and is covered by structures, impervious surfaces, and introduced landscaping. There are no natural habitats and no native vegetation remaining on the site. Existing landscaping on the site, including mature trees at the interior of the site as well as other landscaping, would be removed and replaced with other landscaping. The existing trees are not native to the site, nor are they rare or endangered, nor do they contain significant habitat value. Thus, removal of these trees would not be a significant impact. Development of the site would not be expected to affect, or substantially diminish, plant or animal habitats. The proposed project would not remove sensitive vegetation, habitats supporting sensitive species or wetlands. Landscaping proposed as part of the project would include plants and street trees appropriate for the urban landscape of the project site. Therefore, vegetation and wildlife effects of the project would not be significant, and this topic will not be discussed in the EIR.

9. Geology / Topology. Could the project:	Yes	No	Discussed
a. Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?	__	X	X

b.	Change substantially the topography or any unique geologic or physical features of the site?	__	X	X

The proposed project site slopes downward approximately ten feet in elevation from the western portion of the site to the east and is currently covered by 22 three-story buildings, landscaping, paved courtyards and surface paved parking areas. Soil on the site is loose to medium dense sand to silty fill that extends about five to 15 feet. Varying amounts of gravel, brick and debris exist within the fill, which is underlain by loose to medium dense sand that becomes increasingly dense at an approximate depth of 20 feet below the surface. This lenses of compressible peat that ranged from a few inches to one foot thick exist within the sand. Groundwater is believed to be at approximately 25 to 27 feet below existing grade.[6]

The Community Safety Element of the *San Francisco General Plan* contains maps that show areas subject to geologic hazards. The project site is located in an area subject to ground shaking from earthquakes along the San Andreas and Northern Hayward Faults and other faults in the San Francisco Bay Area (Maps 2 and 3 in the Community Safety Element). The project site is in an area of liquefaction potential (Map 4 in the Community Safety Element), a Seismic Hazards Study Zone designated by the California Division of Mines and Geology. A Geotechnical Investigation Report prepared in September 2001 identified that potentially liquefiable soil across the site is about 15 feet thick and was encountered at depths ranging from about five to ten feet below the ground surface; these soils would likely liquefy under strong ground shaking associated with a moderate to large earthquake on a nearby fault.[7]

In its review of the building permit application for a development proposal in an area of liquefaction potential, the Department of Building Inspection (DBI) would require the project sponsor to prepare geotechnical reports to assess the nature and severity of the hazards at the site and to recommend project design and construction features that would reduce those hazards. One or more geotechnical (foundation) investigations for the proposed project by a California-licensed geotechnical engineer would be included as part of the proposed project. The project sponsor and its contractors would follow the recommendations of the final geotechnical reports regarding any excavation and construction for the proposed project, including the types of foundations necessary to support various proposed project elements (see Mitigation Measure 3a on page 33). To ensure compliance with all current San Francisco Building Code provisions regarding structural safety, DBI would review the geotechnical report and building plans for the proposed project, and determine the necessary engineering and design features to reduce potential damage to structures caused by groundshaking and liquefaction. In this way, amelioration of potential damage to structures from geologic hazards at the project site would be ensured through DBI requirement for a geotechnical report and compliance with building permit requirements.

The primary geotechnical issues that would be addressed in the design are foundation type and supporting capacity, settlement under building loads and earthquake shaking, excavation and temporary shoring, and dewatering. Construction of the project would require excavation to a depth ranging from about six to nine feet throughout the site. Stability and site safety during excavation would be achieved through standard, accepted shoring techniques. Because the building permit process provides for review of the site conditions and final building design, no

people or structures would be exposed to potential geologic hazards, and the impact of the proposed project would be less than significant.

The project would not significantly alter the topography of the site, or otherwise affect any unique geologic or physical features of the site. No further analysis of geology and seismicity is required in the EIR.

10. Water. Could the project:

		Yes	No	Discussed
a.	Substantially degrade water quality, or contaminate a public water supply?	__	X	X
b.	Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	__	X	X
c.	Cause substantial flooding, erosion or siltation?	__	X	X

The project would include excavation to remove existing partial basements beneath the existing Valencia Gardens buildings at about six to nine feet below grade. Previous excavation has occurred on the site to a maximum depth of ten feet; no groundwater was encountered at this level. Based on the Geotechnical Investigation prepared for the project site, the water table appears to be at a depth of approximately five to nine feet.[8] As such, it is likely that dewatering would be required. Thus, any groundwater encountered during construction would be subject to the requirements of the San Francisco Industrial Waste Ordinance (Ordinance No. 199-77), requiring that groundwater meet specified standards before being discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works would be notified if the project were to require dewatering.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater monitoring wells and/or instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor. The project would include Mitigation Measures 3b, 3c, 4a and 4b to reduce the potential water quality effects of dewatering (beginning on page 33). No further analysis of water resources is required in the EIR.

The project site is almost entirely paved or covered by landscaping and structures. The project would cover approximately 75 percent of the area with paved surfaces. The project would not substantially affect the area of impervious surface at the site or alter site drainage. Project-related wastewater and storm water would continue to flow to the combined sewer system. During

construction, requirements to reduce erosion would be implemented pursuant to California Building Code Chapter 33, Excavation and Grading. During operations, the project would comply with all local wastewater discharge requirements.

11. Energy / Natural Resources. Could the project:	Yes	No	Discussed
a. Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	__	X	X
b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	__	X	__

San Francisco consumers have recently experienced rising energy costs and uncertainties regarding the supply of electricity. The causes of these conditions are under investigation and are the subject of much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demands and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is currently considering applications for the development of new power-generating facilities in San Francisco, the Bay Area and elsewhere in the State. These facilities could supply additional energy to the power supply "grid" within the next few years. The project would meet current State and local codes concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the Department of Building Inspection. For this reason, it would not cause a wasteful use of energy. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed projects would not result in a significant physical environmental effect and will not be further discussed in the EIR.

12. Hazards. Could the project:	Yes	No	Discussed
a. Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	__	X	X
b. Interfere with emergency response plans or emergency evacuation plans?	__	X	X
c. Create a potentially substantial fire hazard?	__	X	X

A Phase I Environmental Site Assessment (ESA) of hazardous materials at the project site was prepared by Engineering/Remediation Resources Group in October 2001.[9] Findings of the Phase I ESA are available for public review by appointment at the San Francisco Planning Department, and are summarized in this section.

Hazardous Materials Use

Regarding the potential for public health hazards, the proposed project would involve the development of residential, community room, employment training center, and childcare uses that would require relatively small quantities of hazardous materials for routine activities. The development would likely handle common types of hazardous materials, such as paints, cleaners, and solvents. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, routine hazardous materials use in residential, community room, employment training center, and childcare uses are not typically considered to pose any substantial public health or safety hazards related to hazardous materials.

Soil and Groundwater

Soil and groundwater conditions at the project site were investigated in the Phase I ESA. The results of site samples and chemical analyses performed as part of the Phase I ESA investigation indicate the soil and groundwater within the vicinity of the sample locations do not appear to be impacted by contaminants at a level of concern, and are not anticipated to pose significant risk to humans or the environment. Soil samples collected as part of the Phase I ESA contained detectable levels of diesel or benzo(a)pyrene; however, only benzo(a)pyrene was detected at concentrations exceeding the US EPA Region IX Preliminary Remediation Goals for residential uses in one of the test borings. Additional sampling and analysis of benzo(a)pyrene at the site is recommended if soil excavation is required within the test area where this substance was identified.

Project geotechnical investigations of the groundwater at the site indicates that the groundwater level is approximately six to nine feet below the surface. As such, excavation and construction of the proposed project, which would exceed six feet, would have the potential to impact groundwater. No significant human exposure to chemicals in the groundwater is expected at the project site as no current or future beneficial uses of groundwater at the site are anticipated and the proposed design covers the majority of the site (approximately 75 percent) with either asphalt or concrete. In addition, the project site is located at a significant distance (more than 2.5 miles) from the San Francisco Bay, and as such, adverse impacts of the chemicals in the groundwater to the aquatic community in the Bay is anticipated to be insignificant.

As additional sampling and analysis of benzo(a)pyrene at the site has been recommended by the Phase I ESA, the project includes Mitigation Measure 5 to further characterize soil and groundwater conditions (page 34). If additional environmental studies conclude that soil and groundwater conditions could pose significant human health or safety hazards, a Site Safety and Health Plan would need to be prepared pursuant to California Division of Occupational Safety and Health requirements and National Institute for Occupational Safety and Health guidance to ensure worker safety. Under these requirements, the Site Safety and Health Plan would need to be prepared prior to initiating any earth-moving activities at the site. The plan would contain policies and procedures to protect site workers from potential health and safety impacts related to contaminated soil and groundwater. The plan would apply to all site activities through the completion of earthwork construction. It would include specific training requirements and

personal protection equipment for on-site workers. The Site Safety and Health Plan is not required to include measures to minimize the potential for public exposure. Mitigation Measure 5 is included to minimize potential public exposure to less than significant impacts (page 34).

Building Materials

Existing buildings at the project site could contain hazardous materials, such as asbestos, polychlorinated biphenyls (PCBs), lead, mercury, or other hazardous materials. In the past, asbestos, PCBs, and lead were commonly installed in insulation, floor tiles, roofing tar, electrical transformers, fluorescent light ballasts, and paint. Mercury is common in electrical switches and fluorescent light bulbs. If such hazardous materials exist in buildings to be demolished, they could pose hazards to workers, neighbors, or the natural environment.

Both lead paint and asbestos have been identified at the Valencia Gardens site.[10] However, the proposed project includes a mitigation measure (see Mitigation Measure 5, page 34) intended to reduce to the potential health risks associated with building materials containing asbestos, PCBs, lead, mercury, or other hazardous materials by securing the investigation, removal, and disposal of these materials prior to demolition of the buildings.

Mitigation Measure 5 would ensure compliance with existing regulations applicable to the management of any potentially hazardous building components. For example, the BAAQMD regulates airborne asbestos and is to be notified ten days in advance of any proposed demolition. It randomly inspects asbestos removal operations. The California Division of Occupational Safety and Health is also to be notified of asbestos abatement operations. It oversees requirements placed on asbestos abatement contractors whenever asbestos-related work involves 100 sq. ft. or more of asbestos-containing material. Because buildings constructed prior to 1979 are assumed to contain lead-based paint, demolition activities involving lead-based paint are to comply with Chapter 36 of the San Francisco Building Code. The ordinance requires that containment barriers be at least as protective of human health and the environment as those in the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards promulgated by the US Department of Housing and Urban Development. Polychlorinated biphenyls are regulated under the federal Toxic Substances Control Act of 1976, and mercury is regulated as a hazardous waste. These existing laws and regulations would help to ensure the health and safety of workers, neighbors, and the natural environment.

Fire Safety and Emergency Access

San Francisco ensures fire safety through provisions of the Building Code and Fire Code. Existing buildings are required to meet standards contained in these codes. The proposed project would also conform to these standards, which may include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hydrant water pressure and emergency access) would be addressed during the permit review process.

With implementation of the mitigation measures included as part of the project, as identified on pages 34-35, potential health and safety issues related to existing and future hazardous materials use, contaminated soil and groundwater, potentially hazardous building components, and fire

safety and emergency access would be reduced to less-than-significant levels. Therefore, these issues do not require further analysis and will not be discussed in the EIR.

13. Cultural Resources. Could the project:	Yes	No	Discussed
a. Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	**TO BE DETERMINED**		
b. Conflict with established recreational, educational, religious or scientific uses of the area?	__	X	X
c. Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	__	X	X

Archaeological/Cultural Resources

Archeo-Tec Consulting Archaeologists completed ~~an archival cultural resources evaluation of the project vicinity for potential subsurface historical or prehistoric archaeological resources and to document the history of the area.~~ an archaeological research design and treatment plan (ARD/TP) for the proposed project. The Valencia Gardens HOPE VI Project ARD/TP[11] addresses the prehistoric, historic, and natural formation contests of the project site; evaluates the potential for significant archaeological resources to be present within the project site; identifies the property types and research themes related to expected archaeological resources; and incorporates prehistoric resources and historic resource treatment plans. Potential for the existence of subsurface cultural resources of the prehistoric/protohistoric period (c. 4000 B.C. - A.D. 1775), Spanish/Mexican and Early American era (1776-1848), the Gold Rush era (1849-11857), and the Late 19th Century era (1858-1906) were systematically examined.

There are no currently recorded prehistoric archaeological sites identified within the project site. However, in its natural state, the project site was situated on relatively level ground at elevations ranging between 20-40 feet above mean sea level. It was surrounded by a series of undulating, brush-covered sandy hills. A tributary of Mission Creek was located no further than one block to the north of the site; one historical source indicates that this tributary drainage actually transected the site. Another drainage, known as Dolores Creek, was situated roughly two blocks to the south of the proposed site. Both Mission Creek and Dolores Creek (and their various tributary drainages) emptied into the marshes, situated less than one mile to the east of the project site, surrounding the shoreline of Mission Bay. The natural state would have been generally favorable to the establishment of prehistoric settlements and the possibility of encountering previously unrecorded, and potentially highly significant prehistoric archaeological resources is substantial. In addition, the project site is approximately 2 blocks from the historic Mission Dolores complex. Spanish missionaries tended to establish their churches in close proximity to existing Native American settlements, and missionaries were drawn to the same geographical and topographic

features – i.e., proximity to water and sheltered ground – that had given rise to the establishment of earlier Native American villages.

There are no currently recorded historical archaeological sites identified within the project site. However, the possibility of encountering previously unrecorded, and potentially highly significant historical archaeological resources is substantial. Archival research has shown numerous Spanish/Mexican era (1776-1846) buildings existed in direct proximity. During the Early American and California Gold Rush eras (1848-1857), the project area was situated near the heart of the small community that existed near Mission Dolores; San Francisco's burgeoning city center region was located between 2-3 miles away. The 1852 U.S. Coast and Geodetic Survey map of San Francisco reveals that one or two small buildings, most likely small residential edifices, had been erected within the borders of the present subject parcel. Throughout the remainder of the 19th century (1857-1906), the project area and its environs remained primarily residential in demographic character, with an increasing assortment of associated commercial and industrial enterprises as population in this area increased with the growth of the city. The 1889 and 1899 Sanborn Fire Insurance maps indicate that the majority of the site was occupied by two large vegetable gardens, tended by Chinese people, with a variety of ancillary buildings, which were completely devastated by the 1906 Earthquake and Fire. By the 1914 edition of the Sanborn Fire Insurance Maps, the site was utilized by one of the City's early baseball stadiums, with the street frontages still taken up by a variety of single-family dwellings and flats, along with a greater number of small businesses.

The proposed project would include excavation of the project site to a depth of up to about 9 feet for the removal of existing partial basements, soil excavation, soil replacement, soil compaction and foundation construction. Although there is no indication of archeological resources at the project site based upon archival evidence, there is potential for the proposed project to disrupt or adversely affect previously unknown prehistoric resources and/or historical archaeological resources from the prehistoric period. The project includes Mitigation Measure 6 (see page 35) that would reduce the potential impact to archaeological/cultural resources to a less-than-significant level. Archaeological resources will not be discussed further in the EIR.

Historic Resources

A *Draft Historic Significance Evaluation, Valencia Gardens, San Francisco, California (July 1997)* prepared for the San Francisco Housing Authority identified that the Valencia Gardens Public Housing development appears eligible for the National Register of Historic Places under "Criterion A, due to its association with the social and architectural history of public housing, and under Criterion C, because it is the work of a well-known Bay Area architect, landscape architect and sculptor, and embodies the distinctive characteristics of the Modern style associated with the Bay Area."[12] As described in the draft report, the Valencia Gardens buildings were designed in 1941 by architects William Wurster and Harry Thomsen and include landscape design by landscape architect Thomas Church with eight sculptures designed for the Valencia Gardens site by local sculptor Benieminio "Benny" Bufano. The 22 buildings, arranged in a serpentine plan creating three formal garden courtyards that open to the 15th Street and two service courtyards that open to the parking area at the north end of the site, would be demolished as part of the proposed project. Valencia Gardens Public Housing was surveyed in the 1976 Department of City Planning (DCP) Architectural Inventory and rated a "0", the lowest survey rating,

denoting "contributory" or of "minor or no importance," individually. The Valencia Gardens site is not a designated San Francisco Landmark, nor are the buildings Category I-IV buildings or within any historic district created by Article 10 of the City Planning Code. Valencia Gardens is not included in the California Register of Historic Resources. Because the Valencia Gardens Housing appears to be eligible for the National Register, Architectural Resources will be discussed in the EIR, including the potential significance of the Valencia Garden buildings, and the project's relationship to other historic resources in the vicinity.

C. OTHER	Yes	No	Discussed
Require approval of permits from City Departments other than the Department of City Planning or Bureau of Building Inspection or from Regional, State or Federal Agencies?	X	—	—

D. MITIGATION MEASURES	Yes	N/A	No
1. Could the project have significant effects if mitigation measures are not included in the project?	X	—	—
2. Are all mitigation measures necessary to eliminate significant effects included in the project?	—	—	X

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The project sponsor has agreed to implement all of the following measures as part of the project. In addition, the EIR will contain a chapter describing mitigation measures proposed as part of the project and measures that would be, or could be, adopted to reduce potential adverse project effects identified in the EIR.

Mitigation Measure 1. Construction Noise

The project sponsor shall require project construction contractor(s) to pre-drill holes to the maximum depth feasible on the basis of soil conditions. Contractors shall be required to use construction equipment with state-of-the-art noise shielding and muffling devices.

Mitigation Measure 2. Air Quality / Climate

a. The project sponsor shall require the contractor(s) to spray the site with water during excavation and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during excavation and construction at least once per day to reduce particulate emissions.

b. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, The project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for

this purpose. The project sponsors shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions from equipment that would be in frequent use for much of the construction period.

Mitigation Measure 3. Geology / Topography

a. One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and its contractors shall follow the recommendations of the final geotechnical reports regarding any excavation and construction for the project. The project sponsor shall ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent buildings for damage during construction, if recommended by the geotechnical engineer.

b. If dewatering were necessary, the final soils report shall address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the soils report would determine whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Instruments shall be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge shall be used to halt this settlement. The project sponsor shall delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street shall be born by The project sponsor.

   If dewatering were necessary, the project sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

c. The project sponsor and its contractor shall follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems shall be modified as necessary in the event that substantial movements are detected.

Mitigation Measure 4. Water Quality

a. If dewatering were necessary, the project sponsor shall follow the recommendations of the geotechnical engineer or environmental remediation consultant, in consultation with the Bureau of Environmental Regulation and Management of the Department of Public

Works, regarding treatment, if any, of pumped groundwater prior to discharge to the combined sewer system.

If dewatering were necessary, groundwater pumped from the site shall be retained in a holding tank to allow suspended particles to settle, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works to reduce the amount of sediment entering the combined sewer system.

b. The project sponsor shall require the general contractor to install and maintain sediment traps in local storm water intakes during construction to reduce the amount of sediment entering the combined sewer system, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works.

Mitigation Measure 5. Hazards

a. In addition to local, state, and federal requirements for handling hazardous materials and soil and groundwater containing chemical contaminants, the project sponsor shall enter into a remedial action agreement with the Department of Public Health pursuant to Health and Safety Code Section 101480 et seq. At a minimum, the project sponsor shall undertake the following work and any additional requirements imposed by the Department of Public Health under the agreement.

1. In the event that contamination is discovered during redevelopment activities, a Phase II Environmental Site Assessment shall be prepared for the project site. It would involve the collection and analysis of soil and groundwater samples as directed by the site assessment consultant. Sampling shall extend at least to depths proposed for excavation. The project sponsor shall conduct a soil and groundwater investigation to assess the potential for soils with elevated levels of arsenic, if any. Soil or groundwater samples, or both, would be collected throughout the project site as directed by the site assessment consultant. This assessment shall be completed by a Registered Environmental Assessor or similarly qualified individual prior to initiating any earth-moving activities at the project site.

   If it were determined by sample collection and analysis that arsenic is present on building materials, the impacted materials shall be tracked and managed throughout the demolition. If deemed necessary, some impacted materials shall be mitigated prior to demolition. Soils with elevated arsenic concentrations may require excavation and off-site disposal. Soils with elevated arsenic concentrations shall be disposed of off-site in accordance with California hazardous waste disposal regulations (CCR Title 26) or shall be managed in place with approval of the California Department of Toxic Substances Control (DISC) or the Regional Water Quality Control Board (RWQCB).

   If the Phase II assessment result in earth-moving activity that requires preparation of a Site Safety and Health Plan, in addition to measures that protect on-site workers, the plan shall include measures to minimize public exposure to contaminated soils. Such measures would include dust control, appropriate site

security, restriction of public access, and posting of warning signs, and would apply from the time of surface disruption through the completion of earthwork construction.

2. Prior to any demolition or excavation at the project site the project sponsor shall conduct surveys to identify any potentially hazardous materials (other than asbestos and lead) in existing buildings or building materials. At a minimum, these surveys shall identify any polychlorinated biphenyls, mercury, or other hazardous materials that would require removal and disposal before demolition. These surveys shall be completed by a Registered Environmental Assessor or a similarly qualified individual.

3. All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and any other agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor shall submit to the San Francisco Planning Department and the San Francisco Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report shall be certified by a Registered Environmental Assessor or a similarly qualified individual who states that all necessary mitigation measures have been implemented.

Mitigation Measure 6. Cultural Resources

a. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant shall prepare an archeological research design (ARD) that shall include an historical context, an assessment of research potential in terms of research questions, and an evaluation of the significance as an historical resource (CEQA Guidelines Sect. 15064.5 (a)(c)) of the expected archeological resources. The archeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (Archaeo-Tec., *From Bull Fights to Baseball: Archaeological Research Design and Treatment Plan for the Valencia Gardens HOPE VI Project*, December 2002) at the direction of the Environmental Review Officer (ERO). In instances of any inconsistency between the requirements of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirement of the latter shall prevail. All plans and

reports to be prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend project construction activities for up to a maximum of four weeks. At the direction of the ERO, the suspension of project activities can be extended beyond four weeks only if such a suspension is necessary and is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources, to identify any archeological resources found, and to evaluate the significance of any archeological resources found as an historical resource.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or a archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A) the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B) a data recovery program shall be implemented.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the resource is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources were encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit the a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.
- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. <u>If the human remains are not Native American, the archaeological consultant will notify the Roman Catholic Archdiocese of San Francisco who will be afforded a reasonable time to make recommendations to the project sponsor and consultant for the treatment and disposition of the remains and associated burial items. Following consultation with the Roman Catholic Archdiocese, a procedure for the treatment of non-Native American human remains and associated burial items that may include the preservation, removal, analysis, curation, or reinternment of the human remains and/or associated burial items will be formulated and implemented.</u>

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO evaluating the historical importance of the archeological resource and describing the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s). Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: the San Francisco Redevelopment Agency (number of copies as required by SFRA); California Archaeological Site Survey Northwest Information Center (1 copy) and the President of the Landmarks Preservation Advisory Board (1 copy). The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

E. IMPROVEMENT MEASURES

The following Improvement Measures, which have been agreed to by the project sponsor, diminish effects of the project that are identified in the environmental analysis as being less-than-significant impacts.

Improvement Measure 1. Loading

To accommodate large truck deliveries, particularly for move-ins, the building management shall work with tenants to schedule large deliveries and block off on-street parking spaces in the private street with cones for loading activities. To accommodate passenger loading for the childcare use, two on street parking spaces on Valencia shall be designated a passenger loading zone during the morning drop-off and afternoon pick up periods. This shall be accomplished though project sponsor coordination with the DPT.

Improvement Measure 2. Limit Construction Movement of Off-Peak Hours

Any construction traffic occurring between 7:00 AM and 9:00 AM or between 3:30 PM and 6:00 PM would coincide with peak hour traffic and could impede traffic flow. The impact of lane closures and construction traffic would decrease the capacity of streets and slow the movement of traffic (including MUNI buses). To the extent possible for future projects in the study area, truck movements shall be limited to the hours between 9:00 AM and 3:30 PM to minimize disruption of the general traffic flow on adjacent streets.

Improvement Measure 3. Coordinate with City Departments to Reduce Traffic and Pedestrian Impacts During Construction

The project sponsor and construction contractor shall meet with the Traffic Engineering Division of the Department of Parking and Traffic and the Fire Department to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of the project. In addition, to ensure that construction activities do not impact Muni bus stops or routes in the area, the Project Sponsor shall coordinate with Muni's Chief Inspector prior to construction.

F. ALTERNATIVES

The EIR will discuss a variety of alternatives to the project that would reduce or eliminate any significant environmental effects. At the least, the EIR will including the following:

- No-Project Alternative
- Renovation/Reuse Alternative

G. MANDATORY FINDINGS OF SIGNIFICANCE

		Yes	No	Discussed
1.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?	X	__	X
2.	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	__	X	X
3.	Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	__	X	X
4.	Could the project cause substantial adverse effects on human beings, either directly or indirectly?	__	X	X

If the existing Valencia Gardens buildings are determined historically significant, their proposed demolition could eliminate an important example of California history. This issue will be discussed in the EIR. The proposed project is not anticipated contribute to cumulative noise levels nor cumulative traffic impacts. The project is not anticipated to cause a substantial adverse direct or indirect effect on human beings, nor does it have the potential to achieve short-term, to the disadvantage of long-term, environmental goals. .

H. ON THE BASIS OF THIS INITIAL STUDY

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning. ☐

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by, or agreed to by, the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers , in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared. ☐

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers , in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared. ☐

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☒

Date

Paul Maltzer
Environmental Review Officer
for
Gerald G. Green
Director of Planning

DOCUMENT PREPARERS

EIP Associates
601 Montgomery Street, Suite 500
San Francisco, California 94111

CHS Consulting Group
500 Sutter Street, Suite 216
San Francisco, California 94102

Notes:

[1] Lisa Pagan, Mission Housing Development Corporation, Memorandum to Gina Messa, EIP Associates. October 22, 2002. The number of residents to be relocated, 630, is from an actual count, which is different from the 1997 residential population of 582.

[2] CHS Consulting Group. *Valencia Gardens Project Transportation Analysis*. October 30, 2002.

[3] Nibbi Brothers General Contractors, Memorandum to Lisa Pagan, September 19, 2002.

[4] BAAQMD, *CEQA Guidelines*. Table 6, Projects with Potentially Significant Emissions, April 1996, p. 24.

[5] CHS Consulting Group. *Valencia Gardens Project Transportation Analysis*. October 30, 2002. Tables 3 and 4.

[6] Engineering/Remediation Resources Group, Inc., *Final Report Geotechnical Investigation, Valencia Gardens, San Francisco, California*, September 20, 2001, pp. 8-9.

[7] Engineering/Remediation Resources Group, Inc., *Final Report Geotechnical Investigation, Valencia Gardens, San Francisco, California*, September 20, 2001, p. 14.

[8] Engineering/Remediation Resources Group, Inc., *Final Report Geotechnical Investigation, Valencia Gardens, San Francisco, California*, September 20, 2001, p. 9.

[9] Engineering/Remediation Resources Group, Inc., *Environmental Investigation, Valencia Gardens, San Francisco, California*, October 15, 2001.

[10] Health Science Associates, *Lead-Based Paint (LBP) Inspection and Testing Report on Valencia Gardens (CAL 1-4), Valencia Gardens Site: Valencia, Fifteenth & Guerrero*, December 6, 1994 and SCA Environmental, Inc., *Asbestos Survey Report for Valencia Garden Housing, San Francisco, CA, Volume 1 - Summary Report & Exterior (All Buildings)*, August 1994.

[11] Archaeo-Tec., *From Bullfights to Baseball: Archaeological Research Design and Treatment Plan for the Valencia Gardens HOPE VI Project,* December, 2002.

[12] Carey & Company, *Draft Historic Significance Evaluation, Valencia Gardens, San Francisco, California*, July 1997, p. 10.

APPENDIX B:
NOTICE OF PLANNING DEPARTMENTS REQUIREMENTS MEMO

PLANNING DEPARTMENT

City and County of San Francisco • 1660 Mission Street, Suite 500 • San Francisco, California • 94103-2414

MAIN NUMBER	DIRECTOR'S OFFICE	ZONING ADMINISTRATOR	PLANNING INFORMATION	COMMISSION CALENDAR
(415) 558-6378	PHONE: 558-6411	PHONE: 558-6350	PHONE: 558-6377	INFO: 558-6422
	4TH FLOOR FAX: 558-6426	5TH FLOOR FAX: 558-6409	MAJOR ENVIRONMENTAL FAX: 558-5991	INTERNET WEB SITE WWW.SFGOV.ORG/PLANNING

NOTICE OF PLANNING DEPARTMENT REQUIREMENTS

January 16, 2003

Lisa Pagan
Mission Housing Development Corporation
474 Valencia Street, Suite 280
San Francisco, CA 94103

RECEIVED
JAN 21 2003

Fred Pollack
Van Meter Williams Pollack
18 De Boom Street, 1st Floor
San Francisco, CA 94107

RE: **340-370 Valencia Street** **(Address of Referral)**
3546/002 **(Assessor's Block/Lot)**
2002.0809C **(Case No.)**

The Planning Department staff urban design advisory team (UDAT) has reviewed the above project. We are generally pleased with the project and are anxious to see it move forward, but we do have several important concerns and design ideas. We understand there are significant financial and other limitations in developing a low income housing project, so rather than list off the design changes we want to see, we would like to meet with you to discuss these concerns and ideas and allow you to provide feedback and answers to some of our questions. Below are some of the issues raised at the UDAT meeting:

Interior Streets:
This project could provide a model for how a *woonerf* can work in San Francisco, so we want to be sure nothing is overlooked, e.g. paving design, grade separation, bollard design and placement, street lighting, and parking. In addition, why are there no pedestrian connections through the site to Albion Street? And why not use the *woonerf* treatment on the Valencia-to-Guerrero corridor? Finally, if the sidewalk space were widened to 15 feet it could be used to satisfy common open space requirements (see Open Space below).

Building Design:
The buildings of the project appear to be too uniform in style and this could be addressed with more variation at the roofline and in the façade materials use. The rooflines are weak and might be improved with stronger cornices.

Valencia Street Frontage:
Valencia Street is probably the most important of the block faces as it a mixed-use neighborhood commercial street. Currently the project site is one of the few stretches without

active commercial frontage. Ideally, the ground floor, if not in actual commercial use, should be designed to appear as commercial street frontage with recessed entries and maximum glazing. The security gates and stairs running parallel to the street use up a lot of valuable street frontage. Finally, the screening across the children's play area might be improved with a more decorative design.

Valencia/15th Street corner:
This corner should be prominent. We would like to see this corner rise to a higher overall height than the rest of the project, perhaps with a prominent architectural feature to signify the gateway to the project.

Open Space:
Planning Code Section 135 requires that each dwelling unit have access to a minimum of 100 square feet of private usable open space or 133 square feet if that space is for common use. Access to and allocation of this required useable open space is not clear from the plans. For example, it appears that only the ground floor units have access to the rear yard open spaces, and the upper level units only have private deck or balcony space, and these decks are typically only 48 to 64 s.f., less than the minimum 100 s.f. required to satisfy the private open space requirement. There is additional "open space" on the site, but very little would qualify as "common usable open space" under the definition of Section 135. Please provide an open space plan or table to clarify the type, amount and location of usable open space available to each unit.

Landscaping:
Where is the yard equipment stored and who maintains the landscaping such as the front gardens, residents or management? Section 143 requires that street trees be spaced at 20 feet not 25 feet as drawn. In addition, we would like to see a landscaping plan.

Details:
We would like to see details for the fences, lighting, bollards, balcony railings, windows, doors, etc. They should be attractive and durable.

UDAT meets every Monday afternoon between 3:30 and 5:00 p.m. Please let us know if and when you can spend about an hour with us to discuss the project.

Please direct any questions concerning this notice to Jon Purvis at (415) 558-6354, or e-mail jonathan.purvis@sfgov.org.

cc: Marshall Foster, UDAT

G:\Documents\Notices\2002\340-370 Valencia.doc

APPENDIX C:
PUBLIC HEARING TRANSCRIPT AND COMMENT LETTER

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MEETING OF THE SAN FRANCISCO PLANNING COMMISSION

VALENCIA GARDENS HOPE VI PUBLIC HOUSING PROJECT

April 24, 2003

REPORTED BY: THOMAS C. BRENNEMAN, CSR NO. 9554

01-332077

1 DR. CARLTON B. GOODLETT PLACE, ROOM 400

SAN FRANCISCO, CALIFORNIA

THURSDAY, APRIL 24, 2003, 4:20 P.M.

P R O C E E D I N G S

SECRETARY: Now to go back to item number 16.

COMMISSIONER ANTONINI: Thank you.

SECRETARY: Case number 2002.0809E, Valencia Gardens Hope VI Public Housing Project. It's a public hearing on the draft Environmental Impact Report.

MS. KOHLER: Good afternoon, Commissioners. I am Joan Kohler, staff with the environmental analysis section of the Department of City Planning. I am standing in for Ron Amadi, who is the environmental coordinator for this environmental document. As Linda said, the case before you is number 2002.0809E, the Valencia Gardens Hope VI Project. It is a proposal to abolish the existing units of public housing at the 14th and Valencia Street site and replace them with a new public housing project of up to 290 units with accessory community facilities.

Today's action is a public hearing on the draft EIR for the project. There will be no decision to approve or disapprove the project. We are here today to

receive comments from the public and yourselves on the information that is contained in the draft EIR on the physical environmental impacts. We are not here to discuss approval or disapproval of the proposed project.

The comment period for written comments on this draft EIR began on March 22nd and will close next Tuesday on April 29th. We have a court reporter here today who will be recording all the comments that we get, and those comments will be responded to in the comments and responses document which will come before you for certification at the time that we're ready to certify the final EIR. This concludes my presentation on this matter, and unless the commission members have any questions, I would respectfully suggest that the public hearing on this draft EIR be opened.

COMMISSIONER ANTONINI: Thank you very much, and I will open public comment on item number 16, Valencia Gardens Hope VI Public Housing Project draft EIR. I don't have any cards as yet. Here they are. Thank you. First speaker is Kenneth Jones, to be followed by Gabrielle Fontanella.

MR. JONES: Good afternoon, Mr. President, members of the Commission, staff. My name is Kenneth Jones. I'm a director of Mission Housing Development, corporation sponsor. I don't have any specific comments

about the EIR. I just wanted to say we're pleased to be here before you and are ready to hear both the public's comments and your comments about the project. We and the tenants are very excited about this project. Mission housing is a 30 year old organization whose offices are half a block away. We're a responsible neighborhood development organization and look forward to working with you on this. Thank you.

COMMISSIONER ANTONINI: Thank you. Gabrielle Fontanella.

MS. FONTANELLA: Good afternoon, Commissioners, ladies and gentlemen. My name is Gabrielle Fontanella. I'm Valencia Gardens' secretary. I am also a resident, and I have been there since July of 1958. I love the area. Due to the fact that we have one block, I live on the Guerrero Street side, and I walk down one block and I catch the 26. So where I walk up, two blocks on Guerrero there's the F Market, or I can go catch BART and get anywhere in the city, and this project needs to go forward as soon as possible. Thank you very much.

COMMISSIONER ANTONINI: Thank you. Are there any other members of the public who wish to comment on this item? Okay. Seeing none -- wait a minute. I think we have one coming up.

MS. BERKOWITZ: Commissioners, good afternoon.

My name is Judy Berkowitz. I would like to refer to section 2, table 3 on page 9 of the EIR, the population for the project and its proposed parking. Current population is 600. The parking is 80. The proposed population doubles to approximately 1200, but the parking only increases to 86. As has been seen with another nearby public housing project, the Bernal Dwellings, the tenants in public housing do own cars, and Bernal Dwellings was built totally without off-street parking, much to its detriment now. There is indeed a great demand for parking in public housing projects. Doubling the population without increasing the parking will cause a detriment to the health, environment and well-being of all concerned, both the tenants in the building and the nearby merchants and residents. It will increase noise, congestion and emissions. Thank you very much.

COMMISSIONER ANTONINI: Thank you. Other members of the public who wish to comment on the proposal, the draft EIR. Okay. Seeing none, I'm going to close public comment on this issue and open it up to Commission comments. And it appears there aren't any. So I think that we'll go ahead and close this item, and we'll continue on to our next item on the calendar. Thank you very much.

I, THOMAS C. BRENNEMAN, hereby certify that the foregoing was taken down in shorthand by me, a certified shorthand reporter and disinterested person, at the time and place therein stated, and that the proceedings were thereafter reduced to typewriting, by computer, under my direct participation and supervision;

I further certify that I am not of counsel or attorneys for either or any of the parties to the said hearing, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

In witness whereof, I have hereunto set my hand this 7th day of May, 2003.

THOMAS C. BRENNEMAN

CSR No. 9554

LANDMARKS PRESERVATION ADVISORY BOARD

1660 MISSION STREET, 5TH FLOOR, SAN FRANCISCO, CA 94103-2414

TEL. (415) 558-6345 • FAX. (415) 558-6409

April 29, 2003

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

On April 16, 2003 the Landmarks Preservation Advisory Board (Landmarks Board) held a public hearing to review and comment on the Draft Environmental Impact Report for the Valencia Gardens Hope VI Project (DEIR) of March 22, 2003. The Landmarks Board took public comment, discussed the DEIR, and arrived at the following comments:

- The Landmarkjs Board concurs with the Project Description, the description of Alternatives, and the assessment of impacts on identified Historical Resources.

- In general, the Landmarks Board believes this is a worthy and necessary project, and that it should proceed as expeditiously as possible. However, the Landmarks Board also finds the documentation submitted is incomplete and inadequate in several areas. Most importantly, it fails to consider the extremely consequential issues of social history that pertain to public housing both nationally and locally, and that are essential points to be understood about the demolition of Valencia Gardens. In addition, the material submitted shows evidence of inattentive development and preparation. These deficiencies must be rectified prior to completion of the project, although they should not be allowed to delay its commencement. Project sponsors indicated general concurrence with these findings.

Specific Landmarks Board recommendations in addition to those of staff are the following:

- The Statement of Significance for Valencia Gardens should be augmented by a scholarly examination of the social history of the housing development, including how social thinking has changed so that the buildings are now considered inappropriate as housing, as well as an

exploration of racial exclusionary policies over the history of these buildings, and how that too has changed.

- The Landmarks Board recommends a copy of the original plans for Valencia Gardens be donated to the San Francisco History Room of the Public Library.

- The Landmarks Board recommends that the statement of significance for the area immediately surrounding Valencia Gardens be supplemented to include the context of the effect of the construction of Valencia Gardens on its original character.

- Proposed mitigation #3 (p. V-3) for the identified significant unavoidable impact of demolition of Valencia Gardens should be amended to include the following specific requirement:

> "The Project Sponsor will provide a publicly accessible interpretive display area on the project site, to include interpretive materials such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Valencia Gardens Housing Project. The documentation report, non-archival photographs, and interpretive display shall be submitted to the San Francisco Landmarks Preservation Advisory Board for review and approval prior to issuance of a certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The Landmarks Preservation Advisory Board may appoint a liaison to work with Project Sponsor in directing the research on the interpretive materials."

The Landmarks Board appreciates the opportunity to participate in review of this important project.

Very truly yours,

Tim Kelley, President
Landmarks Preservation Advisory Board

TK/ag